

STATE OF  
COLORADO

Treitz - DNR, Rebecca &lt;rebecca.treitz@state.co.us&gt;

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**Mathis 6HZ Responses**

2 messages

**Jack Desmond** <jdesmond@vanococonsulting.com>

Thu, Aug 20, 2020 at 1:21 PM

To: Rebecca Treitz - DNR &lt;rebecca.treitz@state.co.us&gt;, "Hix - DNR, James" &lt;james.hix@state.co.us&gt;

Good afternoon Rebecca and James,

I noticed my responses to the last round of review for the Mathis 6HZ Pad were sent to my outbox and never received. I have had trouble sending attachments lately. Can you please confirm you have received them?

I look forward to the discussion tomorrow.

Thank you,

**Jack Desmond**

Project Manager

**973-476-5913**444 E 19th Ave, APT B136  
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**3 attachments****305.a(2) Certification.pdf**  
253K**306.e Certification.pdf**  
376K**COGCC Form 2A Response Notes.pdf**  
144K**Hix - DNR, James** <james.hix@state.co.us>

Thu, Aug 20, 2020 at 4:08 PM

To: Jack Desmond &lt;jdesmond@vanococonsulting.com&gt;

Cc: Rebecca Treitz - DNR &lt;rebecca.treitz@state.co.us&gt;

Hello Jack,

Yes, I received your email with the three attachments for the 305.a.(2), 306.e, and responses to the information requested.

James

[Quoted text hidden]

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**James Hix**

**Oil & Gas Location Assessment Specialist**

**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

P 303.894.2100 x5181 | F 303.894.2109

11/16/2020

State.co.us Executive Branch Mail - Mathis 6HZ Responses

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**1. The Facility layout drawing and the Facility list on the Form 2A have discrepancies as follows:**

**a. The drawing has a well manifold, #4, which is not on the 2A list**

The well manifold is just a set of piping and valves which direct wellbore fluids from each individual well to either a group separator or test separator. The manifold is not an actual piece of equipment, so it would not necessarily show up on an equipment list. COGCC can put the “wellhead manifold” on the equipment list under “other equipment” if necessary.

**b. The drawing has a FKOD as #5 on the west side of the location and not on the 2A list.**

I presumed that a “separator” was anything that separated gas from liquid – so the test separator, group separator, and the flare knockout drum all do this and are listed as the three separators. The heater treater is also part of the separator family - but as it had its own entry under “other facilities”. If the COGCC believes that the heater treated should be listed separately, please update the number of separators to 2 and add the FKOD under the “other facilities” list.

**c. The 2A has 2 cavity pumps and only one submersible pump is on the drawing.**

We included two cavity pumps and a submersible pump because there will be two LACT units with non-submersible cavity pumps for pipeline transportation of crude oil. The LACT units are shown on the drawing and noted as “future”. The LACT pump selection is dictated by the midstream provider who owns/operates the LACTs. We are also including a submersible pump for some type of liquid transfer between the listed equipment (i.e. a pump to transfer FKOD liquids to a tank, or a pump to transfer liquids from tank to tank – both of which are common practice).

**d. 12 electric motors are listed on the 2A and are not on the drawing.**

The 12 electric motors are for the submersible well pumps, which are shown as such on the drawing. Next to wellhead #19 it is annotated “Submersible Pump (TYP.)” The electric motors are part of the pump packages, which is why the motors are not separately noted.

**e. The office and storage are on the drawing and if they are temporary during construction, drilling, and completions, this should be noted in the comments section.**

The office and storage is temporary. Please add onto submit tab.

**Please inform COGCC if the 2A list needs to be revised or provide an updated facility layout drawing.**

Please update the Form 2A list based on comments above.

**2. The attachment titled "305.a.(3) Evidence of Compliance" pertains to for LUMA locations. Please provide a waiver for Rule 305.a.(2) as supporting documentation to the Pre-Application Notification Certification.**

See Attached 305.a.(2) Certification Letter. Please change name of old attachment to “Other”.

**3. The attachment titled "305.A. Certification" incorrectly cites Rule 305.a.(3) . Rule 305.a.(3) only applies to LUMA locations and can't be waived for this permit application. The applicable rule for Buffer Zone notifications is 305.a.(2), and the letter should specify that the Building Unit owner is waiving notice requirements required by that rule. The attachment titled "Rule 305.a.(3) Evidence of Compliance" does not comply with Rule 305.a.(2) because it contains language that waives the notice and meeting requirements and includes language that addresses waiving certain parts of Rules 603, 604 and 605. Please provide a 305.a.(2) Pre-Application Notification certification letter addressed to Director Murphy.**

See Attached 305.a.(2) Certification Letter. Please change name of old attachment to "Other".

**4. A 306.e. certification attachment regarding meeting requirements is required, the rule includes meeting requests from the LGD. Please provide a 306.e. certification as the LGD did not waive the meeting requirements.**

See Attached 306.e Certification Letter. Please change name of old attachment to "Other".

**5. BMPs:**

**a. #9 - references a storm water plan – which is not attached. BMP needs to be revised to remove the reference to the stormwater plan.**

Please remove "and control measures in accordance with a stormwater plan" from the BMP.

**b. #10 - Specifically 10 D provide frequency of stormwater inspections**

BMP 10D. states, "D. There will be *daily* self-inspections during active pad construction drilling, and completions. During non-active times, the inspections will follow the stormwater management schedule." Daily is as specific as Mathis will agree to.

**c. #11 – #13 Do not adequately describe how the Operator will comply with 604.c.(2)G requirements.**

Please delete BMP #11 & #12 and change to one BMP:

604.c.(2)G - Berm Construction: Secondary containment devices will be constructed around crude oil and produced water storage tanks and will enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Secondary containment devices will be sufficiently impervious to contain any spilled or released material.

Berms and containment devices will be inspected at regular intervals and maintained in good condition. No potential ignition sources will be installed inside the secondary containment area unless the containment area encloses a fired vessel.

**d. Missing BMP for Rule 604.c.(2):**

**i. O - Load lines;**

Please add the following as a BMP: Rule 604.c.(2).O: All loadlines shall be bullplugged or capped.

**ii. T – Well site cleared;**

Please add the following as a BMP: Rule 604.c.(2).T: Within ninety (90) days after a well is plugged and abandoned, the well site will be cleared of all non-essential equipment, trash, and debris.

**iii. U - for P&A of the well:**

Please add the following as a BMP: Per Rule 604.c.(2).U, Mathis will identify the location of the wellbore with a permanent monument as specified in Rule 319.a.(5). Mathis will also inscribe or imbed the well number and date of plugging upon the permanent monument.