

FORM
2A

Rev
02/20

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401968859

(DELAYED)

Date Received:

01/29/2020

Oil and Gas Location Assessment

New Location Refile Amend Existing Location Location#: _____

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

Expiration Date:

This location assessment is included as part of a permit application.

CONSULTATION

- This location is included in a Comprehensive Drilling Plan. CDP # _____
- This location is in a sensitive wildlife habitat area.
- This location is in a wildlife restricted surface occupancy area.
- This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10727
 Name: MATHIS OIL AND GAS LLC
 Address: 6300 E HAMPDEN AVE
 City: DENVER State: CO Zip: 80222

Contact Information

Name: Aiden Durham
 Phone: (720) 475-6429
 Fax: ()
 email: info@mathisoil.com

FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): 20190038 Gas Facility Surety ID (Rule 711): _____
 Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: Mathis Number: 6HZ Pad
 County: WELD
 Quarter: SENE Section: 6 Township: 2N Range: 67W Meridian: 6 Ground Elevation: 4843

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 2595 feet FNL from North or South section line
230 feet FEL from East or West section line

Latitude: 40.168191 Longitude: -104.924334

GPS Quality Value: 1.9 - Type of GPS Quality Value: PDOP Date of Measurement: 02/19/2019

Instrument Operator's Name: Monty Wallace

LOCAL GOVERNMENT INFORMATION

County: WELD Municipality: N/A

CONSTRUCTION

Date planned to commence construction: 03/02/2021 Size of disturbed area during construction in acres: 6.15
Estimated date that interim reclamation will begin: 09/02/2021 Size of location after interim reclamation in acres: 4.95
Estimated post-construction ground elevation: 4842

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H₂S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: _____

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Denmore, LLC

Phone: _____

Address: 1942 Broadway

Fax: _____

Address: Suite 314-C

Email: _____

City: Boulder State: CO Zip: 80302

Surface Owner: Fee State Federal Indian

Check all that apply. The Surface Owner: is the mineral owner

is committed to an oil and Gas Lease

has signed the Oil and Gas Lease

is the applicant

The Mineral Owner beneath this Oil and Gas Location is: Fee State Federal Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: _____ Surface Surety ID: _____

Date of Rule 306 surface owner consultation 03/05/2019

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s): _____

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe): _____

Unimproved dry
land. Previous
Poultry Farm.

Subdivided: Industrial Commercial Residential

Future Land Use (Check all that apply):

Crop Land: Irrigated Dry land Improved Pasture Hay Meadow CRP

Non-Crop Land: Rangeland Timber Recreational Other (describe): Non-crop, unimproved dry land

Subdivided: Industrial Commercial Residential

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	524 Feet	272 Feet
Building Unit:	524 Feet	272 Feet
High Occupancy Building Unit:	3814 Feet	3606 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	211 Feet	233 Feet
Above Ground Utility:	200 Feet	219 Feet
Railroad:	5280 Feet	5280 Feet
Property Line: -	230 Feet	251 Feet
School Facility::	5184 Feet	4979 Feet
School Property Line:	4578 Feet	4378 Feet
Child Care Center:	3814 Feet	3606 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)? Yes No

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- Buffer Zone
 Exception Zone
 Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.
- Large UMA Facility – as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 03/05/2019

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on- or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

The parcel owner of the proposed Mathis 6HZ Pad owns the only buildings and building units within 1000' of the proposed oil and gas location. Moving the location further to the north would place the location less than 1000' from the adjacent building unit. Moving the pad location to the south and west would not be technically feasible for drilling the northern laterals. The pad is located as east as possible constrained by the public roadway.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 73 - Vona loamy sand, 3 to 5 percent slopes

NRCS Map Unit Name: 72 - Vona loamy sand, 0 to 3 percent slopes

NRCS Map Unit Name: _____

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes No

Plant species from: NRCS or, field observation Date of observation: _____

List individual species: Prairie sandreed, sandy bluestem, switchgrass, little bluestem, needle and thread, sand sage brush, sideoats grama, western wheatgrass, blue grama, sand drop seed, sand sagebrush.

Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokeycherry)
- Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- Alpine (above timberline)
- Other (describe): Weeds are present in the pre-existing disturbed areas.



WATER RESOURCES

Is this a sensitive area: No Yes

Distance to nearest

downgradient surface water feature: 778 Feet

water well: 1055 Feet

Estimated depth to ground water at Oil and Gas Location 23 Feet

Basis for depth to groundwater and sensitive area determination:

Water well permits were reviewed from within approximately a 1/2 mile radius of the location. There were 13 well permits issued. The average depth to water was 23 feet from recorded static water levels. The nearest surface water is Lupton Bottom Ditch located 778 feet east to northeast.

Is the location in a riparian area: No Yes

Was an Army Corps of Engineers Section 404 permit filed No Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer zone No

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

Is the Location within a Floodplain? No Yes Floodplain Data Sources Reviewed (check all that apply)

Federal (FEMA)

State

County

Local

Other _____

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

WILDLIFE

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area

Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)

Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)

Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)

Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments

The Mathis 6HZC #1 is the reference well used for the location identification. The distances for the cultural setbacks were provided from the nearest proposed well and production facility on the pad. Please see the location drawing for the surveyor-measured cultural distances.

The parcel owner of the proposed Mathis 6HZ Pad owns the only building or building unit within 1000' of the proposed oil and gas location. The owner has waived the 305.a, 305.c, 306.a, and 306.e notifications and meetings in the attached 305.a.(3) Waiver. Operator included this waiver in lieu of a 30 day notification letter. There is an additional letter from the surface owner stating he is the owner of the building units within 1000', and the LGD was notified and approved (pre-application certification).

The two nearest BU are owned by the surface owner. These buildings will be vacated at least 30 days prior to construction. Operator will comply with rules and regulations pertaining to CDPHE Regulation 7 and NSPS Subpart 0000.

Operator is planning to obtain demolition permits to take down all the abandoned poultry barns on the subject parcel. The abandoned barns will be demolished after the Form 2A is approved, and before the first well is drilled. The poultry operation is not in use, no barns are in use, and the surface will not be put back into use as a poultry operation, but will remain as non-crop unimproved dry land. Operator will notify the COGCC when demolition permits are obtained.

The nearest aboveground utility is a service pole on the surface owner's property that connects to an overhead line on the east side of WCR 15. If the service pole were removed the overhead powerline would be 255 feet east of the nearest well.

Mathis Oil and Gas LLC will obtain and maintain a CDPHE stormwater permit. Upon termination of the stormwater permit, following interim stabilization, Operator will implement a COGCC Post-Construction Stormwater Program consistent with COGCC Rule 1002.f.

A Spill Prevention Control Countermeasure (SPCC) will be in place to address any possible spill associated with oil and gas operations. Larger containers will be covered by a SPCC plan, which will be referenced in the Post-Construction Stormwater Management Program specified in Rule 1002.f.(3).

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: 01/29/2020 Email: jdesmond@vanococonsulting.com

Print Name: Jack Desmond Title: Project Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ Director of COGCC Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type

Description

Pre-Construction

All buildings that are within 200 feet of a planned well or planned tank shall be removed prior to initiating construction of the Oil and Gas Location.

Best Management Practices

No	BMP/COA Type	Description
1	Planning	604c.(2).E. Multiwell Pads: This 2A application is for a 12-well pad. This was the best location considering the surface and lease locations. The surface owner provided input into choosing this location. The two building units within 1,000 feet are owned by the surface owner, who is aware of potential O&G development impacts per the surface use agreement. The nearest two building units, which are owned by the surface owner, will be vacated at least 30 days prior to the commencement of any construction activities.
2	Planning	Rule 604.c.(2).W. Site Specific Measures: Lights will be turned downward and away from occupied structures (over 1000 feet away) outside the surface owner's parcel. Once drilling and completion rigs leave the site, there will be no permanently installed lighting onsite.
3	Planning	Rule 604c.(2).B. Operator will use a closed loop system for drilling and fluid management. No pits will be dug.
4	Planning	Production facilities, which are observable from any public highway shall be painted with uniform, noncontrasting, non-reflective color tones (similar to the Munsell Soil Color Coding System), and with colors matched to but slightly darker than the surrounding landscape.
5	Traffic control	Rule 604c.(2).D. Traffic Plan: A traffic plan has been coordinated with Weld County through the approved WOGLA and Access Permit. Operator will pursue a contract to pipe all produced hydrocarbons from the oil and gas location to an existing oil pipeline. In the event a deal is not made produced hydrocarbons and water will be trucked from location.
6	General Housekeeping	Mud control: when conditions exist that roads are excessively muddy, additional fill material will be added in order to fill in potholes, ruts, and puddles and reduce the amount of material that is transported from the well pad, access road, and location to off-site areas. Operator will implement mud mitigation measures (e.g. tracking pad, cattle guard, and gravel) at location exits. WCR 15 is a county road consisting of road base. Operator will actively work with Weld County to ensure there is no adverse impact to the road.
7	General Housekeeping	Rule 604c.(2).P. Removal of Surface Trash: A commercial size trash bin for removing debris will be located on site. This bin will be for use by all parties affiliated with the operation. All trash, refuse pipe, equipment, liquids, chemicals, or other materials brought on location during construction, drilling, and completion operations will be removed and disposed offsite no later than 21 days after the completion of the wells. No such items will be burned or buried on location. Operator will clear debris and trash from the location on a bi-weekly basis or more frequently if necessary.
8	General Housekeeping	General housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and collected at the end of each work day and disposed of at offsite, suitable facilities. If spills occur cleanup will be implemented immediately to minimize any commingling of waste materials with storm water runoff. All waste will be disposed of in a timely manner that will allow for the location to remain free of excess debris.

9	Storm Water/Erosion Control	<p>1002.f Stormwater Management Operator will implement and maintain Best Management Practices (BMPs) at the subject location to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004.</p> <p>Site specific BMPs include: An engineered site retention basin, extending in a north-south direction near the eastern boundary of the well pad. The majority of the surface run-off will be directed to the retention basin. The retention basin is included as part of the disturbed area and interim reclamation area.</p> <p>A site perimeter ditch with appropriately spaced check dams. The ditch will capture run-off not directed to the retention basin. The site perimeter ditch will also direct surface water run-on. The ditch will lead to the northeast corner of the site, then extend east along the lease access road, leading to WCR 15. Filtrex logs (or equivalent) will be placed perpendicular to the ditch prior to surface water leaving location. Sediment traps are not anticipated to be needed along the perimeter ditch due to the flat topography.</p> <p>A 24" site perimeter berm will be constructed along the fill sides (mainly north and east). The perimeter berm will be constructed with the cut soil from the leveling of the well pad. The perimeter slopes, including berms, will be drill-seeded (NRCS seed mix) and mulched to stabilize the soil.</p>	
10	Storm Water/Erosion Control	<p>1002f.(2) Stormwater BMPs</p> <p>A. Completion materials such as sand and chemicals will be covered or contained, in order to not migrate from the location in the event of precipitation and subsequent stormwater runoff.</p> <p>C. Erosion controls will be in place to minimize erosion from unpaved areas, including operational well pads, and road surfaces (see sections above). There are no planned culverts or stream crossings. Soil from cut slopes will be either stockpiled, used as fill, or used for perimeter berms. See sections above for planned erosional controls.</p> <p>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.</p> <p>E. Operator will have spill kit(s) available to clean up minor spills. Larger containers will be addressed in a Leak Detection Plan. Mathis will have nearby emergency response contractors to respond to spill events.</p> <p>F. Vehicle tracking controls will be the road and pad road-base.</p>	
11	Material Handling and Spill Prevention	<p>Drip pans will be used during fueling of equipment to contain spills and leaks. Visual inspections of pipe and connections will be performed frequently to detect leaks which will be immediately corrected, repaired and reported to COGCC as required.</p> <p>Mathis 6HZ Pad will under-go informal and formal inspections. Workers, supervisors, and management will carry out informal "walkabout" inspections daily. Formal inspections will be conducted by management or by a management designate. Formal inspections will be conducted on scheduled quarterly basis but may be carried out more frequently if deemed necessary.</p>	
12	Material Handling and Spill Prevention	<p>604c.(2).N. Control of Fire Hazards: Operator and its contractors will employ best management practices during the drilling and production of its wells and facilities and will comply with appropriate COGCC rules concerning safety and fire. Company will ensure that any material that might be deemed a fire hazard will remain no less than 25 feet from the wellhead(s), tanks and separator(s). Additionally, in accordance with rule 606A.d, flammable liquids will not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. A County approved Emergency Response Plan has been created for this site.</p>	

13	Material Handling and Spill Prevention	Oil-based drilling fluids (OBDF) will be separated from the cuttings at the surface. At the end of its use on a particular well, the liquid oil-based mud will be reused for additional drilling operations or it will be returned to then vendor who originally supplied the mud. Transportation will occur on a daily basis as required to facilitate on ongoing drilling operations. Oil-based drill cuttings (OBDC) will be separated from liquid mud onsite and the cuttings will be temporarily stored onsite in steel bins. Accumulated cuttings will be transported for permanent disposal to a licensed solid waste disposal facility. The actual solid waste disposal facility that will be used will depend on geographic proximity to the well being drilled. Transportation will occur on a daily basis as required to facilitate ongoing drilling operations.
14	Material Handling and Spill Prevention	In accordance with COGCC Rule 1002.f.(2)A. & B., Mathis shall provide a designated storage area for dry bulk chemicals and miscellaneous fluids. The dry chemicals in the storage area shall be adequately protected to prevent contact with precipitation, shall be elevated above storm- or standing water, and shall provide sufficient containment for liquid chemical storage to prevent release of spilled fluids from impacting soil, surface water or groundwater and will prevent the co-mingling of spilled fluids or chemicals with other E&P Waste.
15	Material Handling and Spill Prevention	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.
16	Material Handling and Spill Prevention	Rule 604.c.(2).O: All loadlines shall be bullplugged or capped.
17	Dust control	Dust: Mathis will employ practices for control of fugitive dust caused by operations include but not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, Mathis coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic. Rule 805.c. To prevent dust from becoming a nuisance to the public, water trucks will be utilized to spread water across any dust problem areas.
18	Construction	Rule 604c.(2).M. Fencing Requirements: A permanent fencing plan has been reviewed by the surface owner and applicant. The completed wellsite will be surrounded with a fence and gate with an adequate lock to restrict access to authorized personnel only. Authorized representatives and/or Mathis personnel shall be on-site during drilling and completion operations.
19	Construction	Rule 604c.(2).R. Tank Specifications: Condensate storage tanks will be designed, constructed and maintained in accordance with National Fire Protection Association (NFPA) Code 30 (2008 version). Mathis will maintain written records to verify proper design, construction and maintenance. All records will be available for inspection by the Director.
20	Construction	Rule 604c.(2).S. Access Roads: Operator will utilize the lease access road off of WCR 15 for drilling operations and maintenance equipment. The approximate 153' x 33' access road, and the well pad surface not used for equipment, will be covered with a 6" layer of road base for protection of the soil surface and to minimize tracking of mud off-site. Regular road maintenance will be performed. Dust mitigation will be used as-needed. Operator will be responsible for all maintenance on the access road.

21	Noise mitigation	<p>Drilling and Completion: Operator will operate in accordance with permissible noise levels per COGCC Rule 604.c.(2)A. and 802, as applicable. The nearest two building units, which are owned by the surface owner, will be vacated at least 30 days prior to the commencement of any construction activities.</p> <p>During the drilling and completions phase, Operator will construct sound/visual walls that will be placed around the perimeter of the pad. Access to the pad is off WCR 15 on the east side of the pad and away from the building units in order to reduce noise impacts from truck traffic.</p> <p>Based on the receptor locations of 1,100 to 1,200 distance, projected noise levels are not anticipated to exceed the Light Industrial Zone standard of 65 decibels (db) at the receptor locations. Noise mitigation is not immediately planned for the Mathis 6HZ Pad. If noise mitigation is deemed necessary after drilling and completion activities begin, methods of noise mitigation shall include but not be limited to hay bales, sound walls, or customized semi-trailers. In order to minimize sound levels during drilling operations at nearby residences, rig generators will be located as far as possible from the residence by rig orientation. Noise mitigation features will be installed and removed to have minimal landscape damage.</p>
22	Noise mitigation	<p>Production facilities: It is not anticipated that noise mitigation will be necessary at the proposed tank battery location. After construction is completed, equipment installed and production begins, noise levels will be assessed to determine if mitigation measures will be required to be compliant with Rule 802.</p>
23	Emissions mitigation	<p>604c.(2).C. Green Completion: Test separators and associated flow lines and sand traps shall be installed on-site to accommodate Green completions techniques pursuant to COGCC Rules. The wells are expected to be connected to gathering sales lines within 60-180 days of completion. Prior to a sales line connection, flowback gas shall be thermally oxidized in an emissions control device (ECD), which will be installed and kept in operable condition for least the first 90-days of production pursuant to CDPHE rules. This ECD shall have an adequate capacity for 1.5 times the largest flow-back within a 10-mile radius, will be flanged to route gas to other or permanent oxidizing equipment and shall be provided with the equipment needed to maintain combustion where noncombustible gases are present.</p>
24	Emissions mitigation	<p>When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.</p>
25	Emissions mitigation	<p>604c.(2) F. Leak Detection Plan: Operator will conduct weekly Audio, Visual and Olfactory (AVO) inspections of well heads, separation equipment, tanks, valves, fittings and thief hatches to identify potential leaks and correct promptly. Once per month personnel will conduct additional inspections of facilities with a FLIR camera to ensure no leaks from well heads, separation equipment, tanks valves, fittings, thief hatches, and other potential sources of fugitive emissions.</p>
26	Odor mitigation	<p>Hydrocarbon odors from production facilities are minimized and eliminated by keeping produced fluid hydrocarbons and natural gas contained within pipes, separators, tanks, and combustors. All tanks will be sealed with thief hatches and gaskets. There will be thief hatches for overpressure protection on the tanks, but there will also be guided wave radar (GWR) level sensors. Thief hatches will not be left open. Tank vapors are captured with properly sized piping and combustors.</p>
27	Odor mitigation	<p>Oil-based drilling fluids (OBDF) will be separated from the cuttings at the surface. Gibson D822 will be used as a base fluid which is a distillate and has the benefits of lower BTEX levels and is recognized as having lower odor than traditional oil based mud. Operator will utilize drying shakers which will minimize residual oil on cuttings prior to transport and will promptly remove 4-5 loads of cuttings per day during drilling operations which should help to reduce odors. Cuttings will not be stored on site.</p>
28	Drilling/Completion Operations	<p>604c.(2).Q. Guy Line Anchors: Guy line anchors will not be used. Base Beams will be used to stabilize the rig and removed after drilling.</p>

29	Interim Reclamation	1002.b&c: Soil removal and segregation b. (2) Soil removal and segregation on non-crop-land. Operator will separate and store the topsoil horizon or the top six (6) inches, whichever is deeper, and segregate the stockpile locations to facilitate subsequent reclamation. When separating the soil horizons, Operator shall segregate the horizon based upon noted changes in physical characteristics such as organic content, color, texture, density, or consistency. c. Protection of soils. All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented. Stockpiled soils will be drill seeded (NRCS seed mix) and mulched to minimize erosion. A silt fence will be placed at the base of the soil stock pile. Perimeter ditches with spaced check dams will direct run-off to the site retention basin and/or to the facility perimeter ditch leading off-site.
30	Interim Reclamation	Weeds will be managed in accordance COGCC Rule 1003.f. and 1004.e. as incorporated into the Operator's Noxious Weed plan. This includes up to three treatments per year by a licensed and certified herbicide applicator depending upon the species being managed and mapping as needed, throughout the life cycle of the location (construction – final reclamation). After construction begins, the Operator shall treat all noxious weeds within the pad site perimeter and along access road according to the operator's noxious weed management plan. Re-seeding with according to NRCS guidance will help with weed mitigation.
31	Final Reclamation	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.
32	Final Reclamation	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.

Total: 32 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
2316668	RULE 306.E. CERTIFICATION
2316669	PRE-APPLICATION NOTIFICATION CERTIFICATION
2316670	CORRESPONDENCE
2316671	DIRECTOR DETERMINATION OF DELAY
2369245	OBJECTIVE CRITERIA REVIEW MEMO
401968859	FORM 2A RESUBMITTED
402241548	FORM 2A REJECTED
402251328	MULTI-WELL PLAN
402251337	ACCESS ROAD MAP
402251348	LOCATION DRAWING
402251352	NRCS MAP UNIT DESC
402251354	NRCS MAP UNIT DESC
402251559	MINERAL LEASE MAP
402251561	SURFACE AGRMT/SURETY
402276636	LOCATION PICTURES
402296967	FACILITY LAYOUT DRAWING
402307393	WASTE MANAGEMENT PLAN
402307469	OTHER
402313067	OTHER
402313069	HYDROLOGY MAP

Total Attach: 20 Files

General Comments

User Group	Comment	Comment Date
OGLA	Operator provided 305.a. certification and 306.e. certification on 8/20/2020 - attached. Operator provided additional information regarding the equipment list and BMPs. Added correspondence from Operator as doc no 2316670.	11/16/2020
OGLA	<p>As part of the additional review necessitated under the Oil and Gas Act, as amended, the Director has determined that additional analysis is required to ensure the protection of public health, safety, and welfare or the environment. § 34-60-106(1)(f)(III)(A) C.R.S. This Form 2A application was reviewed against the Objective Criteria published on May 16, 2019, as required by Senate Bill 19-181 and met the following criteria: [#1, #3, and #5.c]. The Objective Criteria Review Memorandum, Document #2369245 is attached to the Form 2A. The Director hereby delays the final determination for this application until the following Rulemaking has been completed and the application has undergone a technical review for compliance with the new rules :</p> <ol style="list-style-type: none"> 1. Mission Change Rulemaking: The application shall be analyzed against Rules promulgated to implement § 34-60-106(2.5)(a) C.R.S. and necessary supplemental information shall be attached to this Form 2A. 2. Alternative Location Analysis: An Alternative Location Analysis, conducted in accordance with Rules promulgated as required by § 34-60-106(11)(c)(I) C.R.S., shall be completed and attached to this Form 2A. 3. Cumulative Impacts: The potential Cumulative Impacts associated with the proposed oil and gas activity shall be analyzed in accordance with Rules promulgated as required by § 34-60-106(11)(c)(II) C.R.S. and necessary supplemental information shall be attached to this Form 2A. <p>Section 34-60-106(1)(f)(III)(A) provides that the Director has the authority to delay final determination of a permit application “[n]otwithstanding any other provision of law.” The Director hereby invokes this authority to delay a final determination beyond the time period required by Section 24-65.1-108(1). The Form 2A has been placed in “Delayed” status in eForms. All information and attachments on the form will be preserved.</p>	11/16/2020
OGLA	<p>ON HOLD: This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form ON HOLD until additional information is received from the applicant.</p> <p>In compliance with § 24-65.1-08(1), C.R.S., the COGCC is providing this written request for all additional information necessary for the COGCC to respond to this application. The applicant may provide all requested information to COGCC via email. Upon receipt of all requested information, the COGCC will have 90 days in which to approve, deny, or request all additional information necessary to complete the regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application.</p> <p>In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:</p> <ol style="list-style-type: none"> 1. The Director determined that the Mathis 6HZ Form 2A could not be approved due to siting concerns. A follow-up meeting between the Director and Mathis is scheduled in November 2020. The necessary information will be discussed and the Director will reassess the siting and approval status. <p>The COGCC will resume review of the Form(s) upon receipt of all required information and the COGCC review will be conducted within 90 days. Email was sent to the Contact Name email address and the Submitter Email address.</p>	10/07/2020
OGLA	On 08/21/2020 the Director held a briefing with the Operator and was considering to Delay this Oil and Gas Location permit application until after the new Rules effective date. The Director determined that the Mathis 6HZ Form 2A could not be approved due to siting concerns. This was conveyed to the Operator on a telephone conference call on that date.	10/01/2020
OGLA	<p>On 3/6/2020, COGCC made a written request to the Operator in compliance with § 24-65.1-108(1), C.R.S.,. The applicant provided requested information to COGCC via email on 5/12/2020.</p> <p>Based on further technical review, this is a request for additional information under of the same statute. Upon receipt of all requested information, the COGCC will have 90 days in which to approve, deny, or request all additional information necessary to complete the</p>	07/10/2020

	<p>regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application. In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:</p> <ol style="list-style-type: none"> 1. The Facility layout drawing and the Facility list on the Form 2A have discrepancies as follows: <ol style="list-style-type: none"> a. The drawing has a well manifold, #4, which is not on the 2A list b. The drawing has a FKOD as #5 on the west side of the location and not on the 2A list. c. The 2A has 2 cavity pumps and only one submersible pump is on the drawing. d. 12 electric motors are listed on the 2A and are not on the drawing. 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. 2. The attachment titled "305.a.(3) Evidence of Compliance" pertains to for LUMA locations. This is a buffer zone Location and the waiver should reference Rule 305.a.(2). 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" should be revised to reference Rule 305.a.(2) and renamed to "Other" 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 note that Rule 605.a.(2) cannot be waived. 4. A 306.e. certification attachment regarding meeting requirements is required, the rule includes meeting requests from the LGD; the LGD did not waive the meeting requirement. 5. BMPs: <ol style="list-style-type: none"> a. #9 - references a stormwater plan – which is not attached. BMP needs to be revised b. #10 - Specifically 10 D provide frequency of stormwater inspections c. #11 – #13 Do not adequately describe how the Operator will comply with 604.c.(2)G requirements. d. Missing BMP for Rule 604.c.(2): <ol style="list-style-type: none"> i. O - Load lines; ii. T – Well site cleared; and iii. U - for P&A of the well. 	
OGLA	On Hold: This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form ON HOLD until additional information is received from the applicant	07/10/2020
OGLA	<p>Operator provided additional information or concurrence with changes to the BMPs:</p> <ul style="list-style-type: none"> - BMP #6 General Housekeeping - Mud control: when conditions exist that roads are excessively muddy, additional fill material will be added in order to fill in potholes, ruts, and puddles and reduce the amount of material that is transported from the well pad, access road, and location to off-site areas. - Operator concurs with removing references to CDPHE-WQCD Construction Stormwater Permit/Stormwater Management Plan (SWMP) from BMP #9 and adding it to the Submit tab comments. - Operator concurs with removing references to the EPA Spill Prevention, Control, and Countermeasures (SPCC) Plan from BMP #10 and BMP #13 and adding SPCC comment to the Submit tab comments. - Operator concurs with combining BMP#17 and BMP#18 since both address dust control. - Operator concurs with adding reference to propane tank listed on Facilities Drawing to the Other Facilities on the Facilities tab. 	06/03/2020

OGLA	<p>Requested additional information or concurrence:</p> <p>BMP #6 General Housekeeping states "Mud control: when conditions exist that roads are excessively muddy, additional fill material will be added in order to fill in potholes, ruts, and puddles and reduce the amount of material that is transported from the wells roads and location to off-site areas." Clarify last part of the BMP.</p> <p>BMP #9 Storm Water/Erosion Control: The COGCC does not have jurisdiction over the CDPHE-WQCD Construction Stormwater Discharge General (CDPS) Permit, or SWMP. Add a reference to the Submit tab and revise the BMP to be more consistent with COGCC Rule 1002.f for Stormwater Management.</p> <p>BMP #10 Storm Water/Erosion Control: Similarly under part "E." of this BMP it states that "Larger containers will be covered by a Spill Prevention, Control, and Countermeasure plan" which is under EPA jurisdiction. - Do you concur with changing this to a 'Leak Detection Plan?' - Add a statement to the Submit tab such as " A Spill Prevention, Control, and Countermeasure plan will be prepared and implemented for this Location."</p> <p>BMP #13 Material Handling and Spill Prevention: "Spill prevention Control Countermeasure (SPCC) will be in place to address any possible spill associated with oil and gas operations." Alternatively, we can move this statement to the Submit tab comment box.</p> <p>BMP #17 and #18: Do you concur with combining these into one BMP for dust control? Attachment - Facilities Layout Drawing lists a future propane bullet tank. Do you concur with adding this to the facilities tab under "Other Facilities?"</p>	06/01/2020
OGLA	<p>Received a telephone call from Operator in response to additional information request:</p> <ol style="list-style-type: none"> 1) If the permits are approved, all of the poultry barns will be demolished prior to pad construction. 2) Revised Location Drawing attached to follow up email indicated that all of the poultry barns will be demolished prior to construction. 3) Operator concurred with removing the reference area map and reference area pictures. 	05/28/2020
OGLA	<p>Requested additional information from the Operator:</p> <ol style="list-style-type: none"> 1) The explanation in the Submit tab comment box needs to include the poultry barns to be demolished and why these existing buildings are not used for the cultural setback distance measurements. The comment needs to identify which buildings will be removed prior to pad construction to demonstrate compliance with the safety setbacks. 2) The Location Drawing also shows buildings including the poultry barns within setback distances of the Location. Those buildings to be removed prior to pad construction shall be identified on the Location Drawing. 3) Since the current/historic land use is not crop land, forestry, recreation, or wildlife habitat, a Reference Area Map and Reference Area Pictures are not required. Provide concurrence to remove the Reference Area Map and the Reference Area Pictures from the attachments. 	05/18/2020
OGLA	<p>IN PROCESS - received requested information form Operator on 5/12/2020; COGCC review will resume and be conducted within 60 days (7/11/2020).</p>	05/12/2020
OGLA	<p>On Hold: This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form ON HOLD until additional information is received from the applicant.</p> <p>In compliance with § 24-65.1-108(1), C.R.S., the COGCC is providing this written request for all additional information necessary for the COGCC to respond to this application. The applicant may provide all requested additional information to COGCC via email. Upon receipt of all requested information, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application. In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:</p> <ol style="list-style-type: none"> 1. The nearest well to an above ground utility is 200 feet and a public road 211 feet. Confirm the distances on the Form 2A, as based on the Location drawing. <ol style="list-style-type: none"> a.) Confirm the distance of the overhead power line. COGCC has a safety setback of 200 feet for these cultural items. b.) Provide information on how Mathis will achieve these safety setbacks while the rig is on Location. 2. Provide a Facility Layout Drawing differentiating between oil tanks or condensate tanks vs water tanks. Clarify if tanks will be used for maintenance if an oil pipeline(s) will be 	03/06/2020

installed to transport oil away from the location.

3. Provide information on the number of volatile organic compound (VOC) Combustors or emission control devices (ECD) mentioned in the BMPs that will be used on Location, but are not listed on the Facilities tab. The Facilities tab lists one vapor recovery unit (VRU) and one flare, which are also shown on the Facility Layout Drawing. Reconcile the discrepancies between the Facilities tab and BMPs for proposed equipment on Location.

4. Clarify if the flare will only be on location during drilling and completions activities, or if the flare will only be used for upset conditions and safety during production.

5. Provide information on any air monitoring plans as a BMP to address potential concerns with emissions from drilling/completion/flow-back operations.

6. BMP Section:

a. BMP #2 Lighting: BMP does not state if there be permanent lighting at the location. Clarify what BMPs will be used for any lights post drilling or state no permanent lighting.

b. BMP #6 Mud Control: Clarify if there will be tracking pads or other vehicle tracking control (VTC) used to mitigate/minimize mud and debris from leaving the Location on to W.C.R 15. Roadbase alone may not be sufficient as a BMP to prevent tracking mud off Location.

c. BMP #7 for removal of trash: Provide timing for a regular schedule for trash removal. (i.e. picked up daily, weekly, bi-weekly) as to not have litter on Location. The SUA states that "all trash, refuse pipe, equipment, liquids, chemicals, or other materials brought on Location during construction, drilling, and completion operations will be removed and disposed offsite no later than 30 days after the completion of the wells. No such items will be burned or buried on Location." This should be added as a BMP.

d. BMP #9 references a retention basin. Provide clarification that this retention basin is included as part of the disturbed area and interim reclamation area east of the wells.

e. BMP #10 references a storm water management schedule. Provide that schedule.

f. BMP #11: provide concurrence to delete the sentence "A permanent fencing plan will be reviewed by the surface owner and applicant" as it is addressed in BMP #19

g. BMP #13 has visual inspections will happen "frequently." Provide more concise timing of the inspections.

h. BMP #22 for noise to off-set building units – there is a Building Unit within 524 feet of the nearest proposed well on Location, and 272 feet of the nearest proposed production equipment. Provide a site specific noise mitigation BMPs to comply with Rule 802 since this Location is in an Exception Zone and a Buffer Zone Location.

i. BMP #27: Clarify statement for thief hatches - will they be opened or will there be an automated/mechanical gauge.

j. Provide an Odor BMP for the Oil based mud (OBM)/ Oil based drilling fluids (OBDF) and cuttings. Clarify what group of OBM/OBDF will be used, if an odor neutralizer will be used to prevent complaints, and provide a description of cuttings management and schedule for removal and offsite disposal to prevent complaints.

7. The reference area pictures are not from an undisturbed location, are not free of weeds, and were not taken during the growing season. A condition of approval (COA) will be added on the Form 2A: The Operator shall submit new reference area pictures taken during the 2020 growing season from an undisturbed, offsite location with similar setting and soil types. Pictures shall be submitted via a Form 4 Sundry no later than November 1, 2020 or a variance request should be submitted.

8. Soil & Plant Community tab indicates noxious weeds are present in the pre-existing disturbed areas. Provide a BMP for controlling weeds on the Location.

	<p>9. Update the planned construction date and the estimated interim reclamation date with future dates as necessary. Form 2A currently states 3/2/2020, and 9/2/2020, respectively.</p> <p>10. Provide updated information on poultry barn demolition timing as available.</p> <p>This Location meets the Objective Criteria #1, #3, #5.c, and #8 set forth by SB19-181:</p> <p>#1 Building Units (BU) within 1,500 Feet – Provide communication with Building Units within 1,500 feet of the Location.</p> <ul style="list-style-type: none"> - The two closest BU are owned by the Surface Owner. Provide information if there are tenants or occupants in these BU or if the BU are unoccupied. - The closest BU owned by the Surface Owner is 524 ft from the nearest proposed well and 272 ft from the closest proposed Production Equipment. The Surface Use Agreement (SUA) states the Surface Owner is responsible to notify any and all tenants or third parties utilizing the surface that may be affected by Operator's activities. The Surface Owner waived notices and consultations per Rule 305.a, 305.c.(1), 305.c.(2), 305.f, 305.h., 306.a., 603.a., and 605.a. Provide information on outreach material that Mathis supplied to the Surface Owner for the two closest BU tenants/ occupants, and/or if any meetings were held, or information on Operator's activities that was supplied to BU owners/tenants within 1,500 feet of the Location. -The COGCC has a Notice to Operators regarding the CDPHE health study to be provided to residents within 2,000 feet of the Location. Provide information regarding timing of sending the health study notices and if there has been any communication with residents within 2,000 feet of the Location. <p>#3. Location is in unincorporated Weld County within 1,500 feet of the Firestone municipal boundary. Provide information on communication Mathis has had with Firestone.</p> <p>#5.c. Sensitive environment for water resources. Mathis BMPs indicate installation of lined, steel containment around the tanks. Provide information on additional containment for separators and flow lines.</p> <p>#8 – Greater than 5,200 BBL of hydrocarbon storage – Facility Layout Drawing indicates Oil and Produced Water tank dimensions as "14 ft x 16 ft." Verify the capacity of the oil tanks and produced water tanks to confirm the total volume of produced fluids stored on the Location.</p>	
LGD	<p>This proposed oil and gas location is situated in the Agricultural Zone District of unincorporated Weld County.</p> <p>This locations application was submitted prior to August 5th, 2019, which was the implementation date of Weld Countys new 1041 regulations. Therefore, the application was processed under the former code requirements. This proposed oil and gas location has already met the Weld Oil and Gas Location Assessment (WOGLA) criteria in place prior to August 5th, 2019.</p> <p>WOGLA19-0199 has been assigned to this location. All files associated with this record can be accessed through the Weld County E-Permit Center.</p> <p>A building permit is required for the production facilities (tank battery, separators, pump jacks, compressors, generators, etc.) from the Department of Planning Services. Access points from County roads require an Access Permit from the Department of Public Works, which includes any necessary traffic control plans and Improvement Agreements. The use of County right-of-way requires a permit from the Department of Public Works.</p> <p>Jason Maxey Director, Oil Gas Energy Department and LGD 970-400-3580</p>	03/05/2020
OGLA	COGCC staff conducted its technical review of this Form 2A Oil and Gas Location	03/04/2020

	Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria # 1, 3, 5.c.	
OGLA	This form passed completeness.	02/21/2020
OGLA	<p>This Form is being returned to Draft for the following, numbers are from previous comment:</p> <p>2. The tab for Construction, Drilling & Waste "Drilling Waste Management Plan" states that wastes will be transported offsite to Commercial facilities; however the attached Waste Management Plan state that petroleum contaminated soils and tank bottoms will be disposed of at either a COGCC approved land application site or a commercial solid waste disposal facility. There is no mention or discussion of any potential land application sites in the Form 2A.</p> <p>8. Water Resources. The Hydrology Map and the distance to surface water on the Water Resources tab agree, but the description comment has a different distance. The background on the Hydrology Map is largely illegible and will need to be updated.</p> <p>11. The 305.e. Evidence of Compliance attachment lists a different facility name and quarter section than is on the form and other attachments.</p>	02/03/2020
OGLA	<p>Technical Review:</p> <p>1. Location Identification tab on Form 2A says "Firestone" for Municipality; however, Location appears to be in unincorporated Weld County. Operator needs to confirm Location information.</p> <p>2. The Form 2A Tab for Construction, Drilling & Waste "Drilling Waste Management Plan" states that wastes will be transported offsite to Commercial facilities; however, the attached Waste Management Plan states that there will be land application of water-based bentonitic drilling fluids. Operator needs to confirm that all E&P Waste will be disposed offsite at commercial facilities. Alternatively, operator needs to get written approval from landowner for use of CMC polymer in land spreading of water-based bentonitic mud. Operator needs site specific background soil samples collected for inorganic parameters - samples from treated stockpile are not indicative of background concentrations or levels.</p> <p>3. Land use does not appear to be "Dry Land Crop Land" under the Land Use Tab of Form 2A. The past land use appears to have been for turkey barns. Operator needs to revise landuse for livestock or other, such as Poultry Farm. Operator needs to confirm future land use.</p> <p>4. Operator needs to provide timing of when the barns will be demolished and which barns will be demolished.</p> <p>5. Discrepancies in distances listed in Form 2A and on Location Drawing for public road and utilities. Confirm nearest BU Dist. Landowner waived COGCC notification/consultation under Rule 305.a = nearest BU (202 ft to 347 ft) Exception Zone. Rule 305.a.(3) for LUMA locations is a waiver and requires a certification letter to the Director for pre-application certifications stating that the only Building Unit within 1,000 feet is the surface owner. Operator needs to attach waiver and revise Location Drawing attachment.</p> <p>6. Location drawing needs to have a "box" or outline showing the Production Area. Operator needs to revise the Location Drawing to show the Production Area.</p> <p>7. Discrepancies in Form 2A and Technical Review COGIS on Distances to School Property line. Child Care facilities appear to be closer to the Location than 3,500 feet to the west and south. School appears to be greater than 5,280 feet from the Location. Operator needs to verify and revise these distances in the Form 2A and on the Location Drawing.</p> <p>8. Sensitive Area - groundwater - nearest well Boda Arlo DTW = 27 ft TD = 72 ft; MH in area TD = 20 ft. Need BMP for GW. Nearest surface water < 1,000 ft : Lupton Bottoms Ditch - East/NE 914 ft A hydrology map was not attached. Loamy sand. Operator needs to attach a Hydrology Map for the Location.</p> <p>Discrepancies in distances listed in Form 2A and on Location Drawing for public road and utilities. Confirm nearest BU Dist. Landowner waived COGCC notification/consultation under Rule 305.a = nearest BU (202 ft to 347 ft) Exception Zone. Discrepancies in Form 2A and Technical Review COGIS on Distances to School Property line.</p> <p>9. Operator needs better water data and an explanation that the depth to groundwater in the nearest water well is not necessarily the depth to shallow ground water. Operator needs to provide BMPs for OBM taking into consideration shallow ground water, and requirements for leak detection for fluids and vapors, and containment for spills.</p> <p>10. Operator needs to provide BMPs. Most of the BMPs, such as "fencing" are not BMPs. Operator needs to provide complete and specific BMPs on how the operator intends to address issues during drilling, completion, and operations.</p>	11/05/2019
Permit	Passed completeness.	03/19/2019

Permit	Referred to OGLA supervisor for buffer zone review.	03/18/2019
Permit	•Returned to Draft at Operator's Request.	03/15/2019

Total: 20 comment(s)

Delayed

Delayed

Delayed

Delayed

Public Comments

No public comments were received on this application during the comment period.

Delayed

Delayed

Delayed

Delayed