

STATE OF
COLORADO

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Gaddis doc no 402443658

13 messages

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: sam_samet@oxy.com

Fri, Sep 11, 2020 at 4:29 PM

Sam,
COGCC is in the process of reviewing the Form 2A for the KMG Gaddis location (doc no 402443658). In order for us to complete our review, please see the following:

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:

1. Under the cultural distances, the nearest well to the property line is listed at 77 feet but based off the Weld County Assessor's site, the property line is almost 300 feet north of the nearest well. Please confirm the distance.
2. The Facility list on the 2A has 5 temporary ECDs and on the Facility layout drawing there are only 4 temporary ECDs. Please confirm the equipment count.
3. The depth to water is listed at 53 feet below ground surface. Based on the surface water bodies to the south, there is a potential for groundwater to be shallower. Please confirm.
4. Will there be any noise mitigation for the Location?
5. Has Oxy submitted the WOGLA to Weld County?

The Form 2A will be placed "On Hold" until all discrepancies are resolved. Let me know if you have questions.

Thank you,

Rebecca

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Rebecca Treitz
Oil and Gas Location Assessment Specialist
P 303.894.2100 x5173 | F 303.894.2109 |
1120 Lincoln Street, Suite 801, Denver, CO 80203
Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

Sam_Samet@oxy.com <Sam_Samet@oxy.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Fri, S

Rebecca,

Thank you for your email. Here are the explanations of the discrepancies that you mentioned in Gaddis doc no 402443658:

1. The distance to the closest property line is 77 feet due to the fact that there is a property line dividing the property that is not shown on the Weld County Assessor's site. Both by the same landowner as mentioned in the attached email conversation. An amended surface damages agreement was attached to the Form 2A to correct the previously signed include both parcels.
2. The reason there's an additional ECD in the list is to account for an ECD if needed to be used during drilling as mentioned in comment #9 on the form 2A.
3. We agree depth to groundwater can be shallower. Please update the estimated depth to groundwater to be 11'. Below is the modified statement for the comment in the water highlighted are the edits from the original.

Ditch: 10' ESE Elev: 5035'

Ditch: 70' SE Elev: 5037'

Farmers Extension Canal: 108' S Elev: 5035'

Pond: 297' S Elev: 5037'

Ditch: 842' S Elev: 5027'

Loc Elev: 5046'

Nearest water wells:

4913' NW, Permit 6648-R, depth 35', Static Water Level 14', Elev 5007' (nearest well with record of being drilled)

Sensitive Area Determination: SENSITIVE AREA, downgradient surface water feature within 1,000' and depth to groundwater less than 20'

Location is NOT in floodplain according to Weld County and FEMA

(SWL calc: (5046 - 5007) + 14 = 53) Based off of distance to nearest water well.

Estimated depth to groundwater likely more representative based off of adjacent surface water. The water level at the pond is at an elevation of 5035' and utilizing that elevation in the 5035 = 11. The closer ditch and canal were not used in the calculation as they are not perennial water features.

4. KMG is not proposing any noise mitigation for this location due to the absence of proximity to building units (+ 2,500 ft). However, a sound survey will be conducted on the rig type anticipate any additional effective noise mitigation once a drilling rig is determined. Ambient monitoring will be conducted prior to drilling operation on this pad. Post-construction, an o

study may be performed when the site is fully operational to ensure compliance with the appropriate COGCC Noise level requirements.

5. Oxy submitted a 1041 WOGLA notice to Weld County that was accepted and deemed complete. Oxy is in the process of preparing a 1041 WOGLA application to submit to Weld

Thank you Rebecca, let me know if you have any other questions.

Sam Samet

Regulatory/Municipal Planning

Occidental Petroleum Corporation (OXY)

Working Remotely - Contact via cell phone or email

Email: Sam_Samet@oxy.com

Cell: 307-660-5553

1099 18th Street, Suite 1800, Denver CO 80202 • P.O. box 173779, Denver CO



From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Friday, September 11, 2020 4:30 PM
To: sam_samet@oxy.com
Subject: Gaddis doc no 402443658

WARNING - This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

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----- Forwarded message -----

From: "Samet, Sam" <Sam.Samet@anadarko.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>
Cc: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Bcc:
Date: Wed, 22 Jul 2020 15:41:21 +0000
Subject: Guidance on Proposed Location

Good morning Rebecca and Chris,

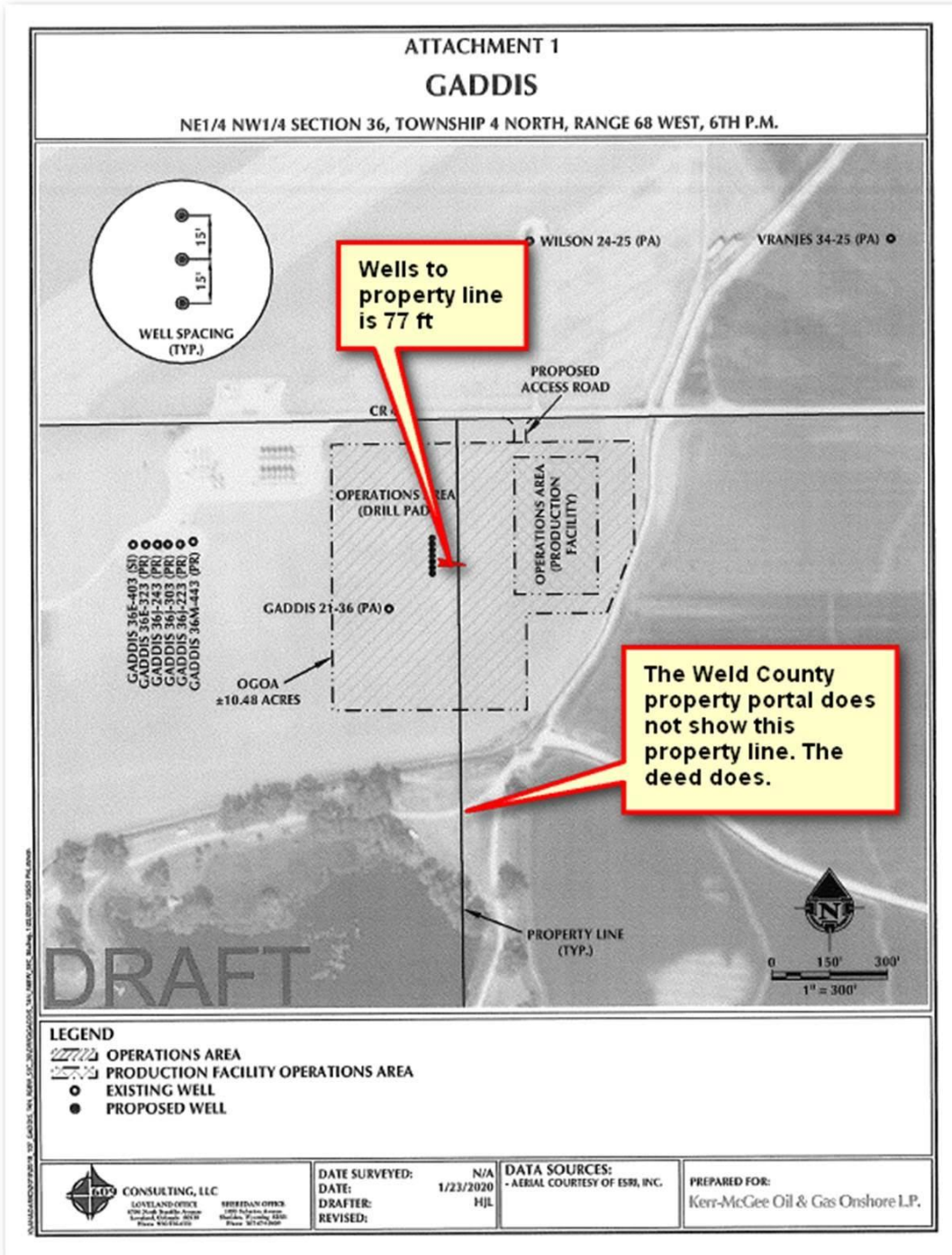
I was wondering if you can give us some guidance on a situation that we have with upcoming form 2A that we intend on submitting soon. The situation is that we have a property line running that was not identified in the Weld County assessor's office property portal so we were looking at one parcel while there were two parcels. This caused us to plan the wells 77ft from the property doesn't meet Rule 603.a.2 (included below). Thankfully, the surface owner owns both parcels and is the owner of the property where the wells are. I'm certainly confident we can get a waiver question to you is can we submit this 2A and/or what are the steps that we need to take?

603. STATEWIDE LOCATION REQUIREMENTS FOR OIL AND GAS FACILITIES, DRILLING, AND WELL SERVICING OPERATIONS

a. Statewide location requirements.

- (1) At the time of initial drilling, a Well shall be located not less than two hundred (200) feet from buildings, public roads, major above ground utility lines, or railroads. Rule 604 setback requirements apply with respect to Building Units and Designated Outside Activity Areas.
- (2) A well shall be located not less than one hundred fifty (150) feet from a surface property line. The Director may grant an exception if it is not feasible for the Operator to meet this minimum distance requirement and a waiver is obtained from the offset Surface Owner(s). An exception request letter stating the reasons for the exception shall be submitted to the Director and accompanied by a signed waiver(s) from the offset Surface Owner(s). Such waiver shall be written and filed in the county clerk and recorder's office and with the Director.

603.b. Statewide rig floor safety valve requirements. When drilling or well servicing operations are in



Thank you.

Sam Samet

Regulatory/Municipal Planning

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Guidance on Proposed Location.eml
639K

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Sam_Samet@oxy.com

Tue, Oct 6, 2020 at 5:33 PM

Sam,
Thank you for the response. Has Oxy submitted the WOGLA for the Gaddis location? Has there been any contact with Berthoud or Mead regarding the location?

Thanks again,
Rebecca
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Sam_Samet@oxy.com <Sam_Samet@oxy.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>, "Sam_Samet@oxy.com" <Sam_Samet@oxy.com>

Wed, Oct 7, 2020 at 8:54 AM

Rebecca,

Oxy is working on submitting the WOGLA. We had to re-work it to comply with the new WOGLA standards that were introduced late September after we submitted the WOGLA notice. Oxy sent a WOGLA notice to the local government Designee of the Town of Berthoud on 6/26/2020.

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Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Wed, Oct 7, 2020 at 11:05 AM

To: Sam_Samet@oxy.com

Thanks Sam.

It looks like the Town of Mead is approximately 1,400 feet west of the Location. Did Oxy reach out to Mead?

Thanks again,
Rebecca.

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Sam_Samet@oxy.com <Sam_Samet@oxy.com>

Thu, Oct 8, 2020 at 4:01 PM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Rebecca,

The town of Mead received a courtesy notification package similar to the WOGLA notice package. No feedback has been received yet.

[Quoted text hidden]

Sam_Samet@oxy.com <Sam_Samet@oxy.com>

Mon, Oct 26, 2020 at 7:51 AM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Good morning Rebecca,

Any other information you need from us on this Gaddis From 2A? Just wanted to follow up and see what we can do to move it forward.

Thank you.

Sam Samet

Regulatory/Municipal Planning

Occidental Petroleum Corporation (OXY)

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OXY Occidental Petroleum Corporation

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Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Mon, Oct 26, 2020 at 10:31 AM

To: Sam_Samet@oxy.com

Thanks Sam,

I will need an updated BMP for the multidisciplinary meeting we talked about last week. Was the WOGLA submitted or was this one to be revised? The statement under the local government section discusses Berthoud, should Mead be added to that statement?

Thank you,
Rebecca

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Sam_Samet@oxy.com <Sam_Samet@oxy.com>

Wed, Oct 28, 2020 at 4:32 PM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Rebecca,

For Gaddis doc no 402443658, you'll find below an alternative statement for the local government section that includes Mead and an updated BMP for the multidisciplinary meeting:

Local Government Statement:

WOGLA notices deemed complete on 7/15/2020. WOGLA to be submitted by 11/15/2020 .

Town of Berthoud and Town of Mead limits within 1500 feet of the proposed oil and gas location. Town of Berthoud limits are also within 1000 feet of the proposed oil and gas location.

A WOGLA notice was sent to the local government designee of the Town of Berthoud and no comments were received. A similar package was also sent to the local government designee of the Town of Mead without feedback.

Please replace BMP #2 with following statement:

12/4/2020

State.co.us Executive Branch Mail - Gaddis doc no 402443658

KMG holds Surface Impact Planning (SIP) meetings for each planned location. These meetings are attended by KMG internal teams. This is a multi-disciplinary team including construction, operations, facilities, EHS, stakeholder relations, regulatory, surface land and mitigation. The team reviews potential impacts to surrounding residents, identifies and plan for necessary mitigations, and identifies BMPs that should be included in the pad development moving forward. The team reviews noise, odor, lights, traffic, haul routes, rig orientation and visual mitigation and any input we have received from surrounding communities either from response line calls or community meetings, relative to our operations. The purpose of the meeting is to proactively identify potential concerns, exhaust possible options and provide best in class solutions in order to have compatible operations.

Thank you Rebecca.

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Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Sam_Samet@oxy.com

Wed, Oct 28, 2020 at 4:53 PM

Thank you

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Sam_Samet@oxy.com <Sam_Samet@oxy.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Mon, Nov 9, 2020 at 10:41 AM

Hi Rebecca,

I was wondering if you're waiting on anything else from us. My team notes that the Gaddis 2A still shows it's on hold. Let me know if I forgot to send you any additional details and I'll provide them right away.

Thank you for all your help with this pad.

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Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Sam_Samet@oxy.com

Mon, Nov 9, 2020 at 12:14 PM

Sam,
I don't know that I have following questions. I received the OK from the director on the Schrute Farms, so I was trying to wrap it up first.

Thanks,
Rebecca

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Sam_Samet@oxy.com <Sam_Samet@oxy.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Mon, Nov 9, 2020 at 12:18 PM

Thank you Rebecca. Have a good day!

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