

STATE OF
COLORADO

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

Dehaan North Location 460556

14 messages

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: JENNIFER.LIND@nickelroadoperating.com

Thu, Feb 25, 2021 at 12:37 PM

Jennifer,

COGCC is in the process of reviewing the Form 2s for the Dehaan Location (ID 460556). In order to comply with the new rules, please provide the following information via Form 4 Sundry:

1. Dust: BMP should include dust control along the access road as well as on location. Consider dust from wind, vehicle disturbance, and drilling or completions operations.
2. Lighting: BMP should consider lighting through all phases of construction, drilling, completions, and regular production operations.
3. Noise: BMP should consider the direction of individuals impacted, hours of operations, types of equipment and noise generated during construction, drilling, completions, and production.
4. Odor: BMP should include the type of OBM to be used, cuttings and fluid management, odors from tanks, loading from tanks to trucks, engines, or any other source of odors.

Please provide COGCC with the following information:

1. Will there be any air monitoring for the Location?
2. Please provide the local government information and information regarding an Emergency Response Plan for the location per Rule 602.j.
3. Please provide communication Nickel Road has had with residential Building Unit residents within 2,000 feet of the Location. Please provide information on how Nickel Road plans to meet Rule 412.b.

Please let me know if you have any questions or would like to discuss the above further.

Thank you,

Rebecca

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Rebecca Treitz
Oil and Gas Location Assessment Specialist
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Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Fri, Feb 26, 2021 at 9:56 AM

Rebecca, please see my responses below in **green**. Please don't hesitate to contact me with any additional questions or requests.

Thank you,

Jennifer

Jennifer Lind

VP – Regulatory & Environmental

Nickel Road Operating LLC

303-406-1117

jennifer.lind@nickelroadoperating.com

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Thursday, February 25, 2021 12:37 PM
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>
Subject: Dehaan North Location 460556

Jennifer,

COGCC is in the process of reviewing the Form 2s for the Dehaan Location (ID 460556). In order to comply with the new rules, please provide the following information via Form 4 Sundry:

1. Dust: BMP should include dust control along the access road as well as on location. Consider dust from wind, vehicle disturbance, and drilling or completions operations.
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4. Odor: BMP should include the type of OBM to be used, cuttings and fluid management, odors from tanks, loading from tanks to trucks, engines, or any other source of odors.

Updated BMPs have been submitted via Sundry Form 4 Doc #402611062

Please provide COGCC with the following information:

1. Will there be any air monitoring for the Location?

Air monitoring will be employed for new well operations commencing after May 1, 2021 in accordance with CDPHE AQCC regulation. An Air Monitoring Plan will be furnished to the AQCC for approval a minimum of 60 days prior to the next occupation on this pad.

2. Please provide the local government information and information regarding an Emergency Response Plan for the location per Rule 602.j.

Emergency response plan was approved and is on file with the Weld County Office of Emergency Management and the Ault-Pierce Fire Department. A copy of the approved ERP for this location is attached for your reference.

3. Please provide communication Nickel Road has had with residential Building Unit residents within 2,000 feet of the Location. Please provide information on how Nickel Road plans to meet Rule 412.b.

Health Risk Assessment Information was provided to all Building Units (9) within 2000' of the location in accordance with COGCC guidance on 1/27/2020. No calls or requests for additional information have been received to date.

Move-in Rig-up Notice was provided to all Building Units (5) within 1000' of the location prior to the first drilling occupation that commenced on 9/8/20. These notices were mailed on 8/7/2020 via USPS certified mail.

In response to the MIRU notice, I received a phone call on 9/2/2020 from Mark Booth, son of Lois Booth (BU Owner within 1000'), inquiring as to the timing of our operations and what to expect. I informed Mr. Booth of our plans for the initial drilling and completion occupation timing and BMPs we planned to have in place for light, noise, dust and odor. I also let Mr. Booth know that I would be available throughout our operations as a resource if there were any issues that arose regarding nuisance conditions of our operations. I also provided Mr. Booth with a copy of the approved Form 2A for the location as well as a map of the DSU lands via email on 9/2/20. The conversation was left on positive terms and not additional requests have been received to date.

Currently, Nickel Road is finalizing completion operations on the first 2-well occupation on this pad and have received no complaints nor inquiries from nearby Building Unit owners.

Upon subsequent drilling occupations being scheduled, MIRU notice will be provided to the Building Units within 2000' in accordance with Rule 412.b.

Please let me know if you have any questions or would like to discuss the above further.

Thank you,

Rebecca

[Quoted text hidden]

 DeHaan N Pad_EAP and TRP_with address (Approved 8.16.19).pdf
9057K

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

Fri, Feb 26, 2021 at 3:26 PM

[Quoted text hidden]

 DeHaan N Pad_EAP and TRP_with address (Approved 8.16.19).pdf
9057K

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Fri, Mar 19, 2021 at 4:08 PM

Thanks Jennifer,
As follow up, please see my additional questions in red for the BMPs and air monitoring. Let me know if you want to discuss any points further.

Thanks again,
Rebecca

Updated BMPs have been submitted via Sundry Form 4 Doc #402611062

Based on our review of the Sundry, please address the following:

For the Light BMP:

- Does Nickel Road have a design or drawing for the lighting?
- Where will the lights be placed to be facing away from Building Units?
- Is there anything to shield the lights on the rig mast?
- Will the lights during production operations be motion activated to then turn off after 30 min?

For the Dust Control BMP:

- What controls will be used for silica dust controls.
- What will warrant the use of wind breaks and road surfacing?
- How will the access road be constructed to minimize dust?
- What is the acreage of the access road?
- How many truck trips per operation are expected?

For the Noise mitigation:

- For "equipment engines to be orientated away from occupied buildings to the maximum extent practicable" how is this determined? Is wind direction taken into consideration?

For the Odor BMP:

- Will rods be wiped down during tripping operations?
- Will Odor Neutralizer be available on location at all times? If there are odor complaints, will additional odor neutralizer be added and to what benefit? The BMP has "Should odor complaints persist" Are these actions all reactive to odor complaints or will they be pro-active?
- Will wells be shut-in until a pipeline is available or variance is approved?
- There is a reference to a process diagram, but it is not attached to the Sundry? Where is the diagram?

Please provide COGCC with the following information:

1. Will there be any air monitoring for the Location?

Air monitoring will be employed for new well operations commencing after May 1, 2021 in accordance with CDPHE AQCC regulation. An Air Monitoring Plan will be furnished to the AQCC for approval a minimum of 60 days prior to the next occupation on this pad.

What does Nickel Road plan to monitor for? Will there be background samples? What action levels will be used? What response does Nickel Road plan for exceedances?

[Quoted text hidden]

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Mon, Mar 22, 2021 at 3:35 PM

Rebecca, I have captured some responses to your additional questions below in **blue**. Please let me know if you think any of these items need be added to the BMP language provided per Sundry Doc # 402611062. Please don't hesitate to reach out with any additional questions on this information.

Thanks,

Jennifer

303-406-1117

jennifer.lind@nickelroadoperating.com

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Friday, March 19, 2021 4:09 PM
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>
Subject: Re: Dehaan North Location 460556

Thanks Jennifer,

As follow up, please see my additional questions in red for the BMPs and air monitoring. Let me know if you want to

discuss any points further.

Thanks again,

Rebecca

Updated BMPs have been submitted via Sundry Form 4 Doc #402611062

Based on our review of the Sundry, please address the following:

For the Light BMP:

- Does Nickel Road have a design or drawing for the lighting?

Yes, I have attached the photometric plan which includes details on the lighting types and a rendering of the lighting proposed for this site. Please note, this photometric plan depicts the extents of our tank battery as it is planned to be built-out for our 2-well first occupation coming online in the next week or so. Upon full build-out of the production facilities at a later date, the location of the lighting masts may be slightly relocated or a lighting mast added, but all will be oriented away from nearest building units to the N / NW.

- Where will the lights be placed to be facing away from Building Units?

1 lighting mast with 2 lights will be located between the separator area and VRU equipment area and will face SW and S away from building units. 2 lighting masts will be erected near the tank area, one of the NE corner of the battery facing SW and one on the SW corner of the battery facing N/NE. Tank catwalk lighting will be mounted between the tanks and angled down to provide lighting on walkway and hand rails only. Tank battery area lighting will be largely blocked from view outside the pad area by the tanks themselves.

- Is there anything to shield the lights on the rig mast?

Rig lights are shrouded in addition to being directed downward and inward toward the mast.

- Will the lights during production operations be motion activated to then turn off after 30 min?

Permanent lighting is not motion activated, but will be turned on with a manual switch on a 30 minute timer. If the operator doesn't manually turn the lights off upon leaving the location, they will automatically turn off after 30 minutes.

For the Dust Control BMP:

- What controls will be used for silica dust controls.

NRO uses sealed sand containers for transportation and on-site storage. Additionally, the service provider utilizes dust control on hopper and belt transfer systems while moving sand into the blender.

- What will warrant the use of wind breaks and road surfacing?

If our standard BMPs are being found to be ineffective (determined through either daily on-site visual inspection or complaint based) on high wind days these measures would be employed. NRO has employed the other proactive dust mitigation measures to great success (roadway watering, reduced speeds, etc.) so these additional measures are outlined to have a safe guard in place in the event that our standard BMPs are found to be ineffective based on an unforeseen circumstance.

- How will the access road be constructed to minimize dust?

NRO uses clean gravel road base which reduces dust potential, and has constructed a large vehicle tracking control pad at the access road entrance to further assist with dust control.

- What is the acreage of the access road?

0.58 acres (1260' of 20' wide road way)

- How many truck trips per operation are expected?

Traffic count breakdown attached for your reference.

Pad construction (complete for this location): 228 trips

Drilling (typ 3-well occupation): 580 trips

Completion (typ 3-well occupation): 764 trips

Production: 24 trips daily (max during peak production months)

For the Noise mitigation:

- For "equipment engines to be orientated away from occupied buildings to the maximum extent practicable" how is this determined? Is wind direction taken into consideration?

Production facilities requiring engines have been located on the eastern side of the pad. Mufflers on these engines will be pointed to the E, away from nearest building units to the N/NW. Wind direction was taken into consideration when planning this facility. With prevailing winds being predominately Westerly / Northerly, wind will carry engine noise S and E away from nearest building units to the N / NW. Additionally, topography in the immediate vicinity assists in both visual and noise mitigation as 1) the surface owner utilizes the lands directly to the E/NE of the pad location as a large manure stockpile area supporting their dairy operation which provides berms between our facility and the building unit to the NE, and 2) the Eaton Ditch bank sits ~5 ft above ground level at our pad location and the ditch sits between our facility and the nearest building units to the N / NW.

For the Odor BMP:

- Will rods be wiped down during tripping operations?

NRO does not use rod pumping, we utilize a gas lift compressor for artificial lifting once the production levels require its use. Please clarify if this is not what you were referring to.

- Will Odor Neutralizer be available on location at all times? If there are odor complaints, will additional odor neutralizer be added and to what benefit? The BMP has "Should odor complaints persist" Are these actions all reactive to odor complaints or will they be pro-active?

Yes, odor neutralizing additives are kept on location throughout drilling operations. While we do have several effective, proactive BMPs in place (listed as 1-4 in the BMP), odor neutralizing additives would be employed reactively in the event odor complaints are received. This portion of the BMP is in place as a safe guard in the event that, for some reason, our standard BMPs are found to be ineffective based on an unforeseen circumstance. To date, NRO has employed the proactive odor mitigation measures to great success and has not received any odor-based complaints on any operations with which we were utilizing OBM.

- Will wells be shut-in until a pipeline is available or variance is approved?

The gas gathering line is in place as we are currently bringing our 1st occupation of wells on line. Future wells drilled / completed on this location will not be shut-in since this pipeline is already in place unless there is some unforeseen upset condition or emergency event that would require the wells to be shut-in for a short period of time. This situation is already captured in the last sentence of paragraph 2 of the odor BMP submitted on the sundry.

- There is a reference to a process diagram, but it is not attached to the Sundry? Where is the diagram?

This BMP and associated diagram was supplied with our WOGLA application. My apologies for the oversight on removing this sentence. If you require, I can provide the PFD or we can remove just this portion of the BMP statement.

Please provide COGCC with the following information:

1. Will there be any air monitoring for the Location?

Air monitoring will be employed for new well operations commencing after May 1, 2021 in accordance with CDPHE AQCC regulation. An Air Monitoring Plan will be furnished to the AQCC for approval a minimum of 60 days prior to the next occupation on this pad.

What does Nickel Road plan to monitor for? Will there be background samples? What action levels will be used? What response does Nickel Road plan for exceedances?

****Please note that the action thresholds and exceedance response actions provided below are estimates and are subject to CDPHE approval upon plan submittal at a later date. While I would be happy to include this in a draft BMP, please note that this is subject to change once the Air Monitoring Plan is processed.**

Baseline air quality will be established directly prior to commencement of operations since the air monitor is required to be in place at least 10 days prior to commencement of "pre-production operations". Unless site-specific or plan conditions require, a separate background sample is not planned to be taken.

Monitoring for: Total VOC, meteorological data

Action levels & Response: Three alert levels will be configured for the total VOC sensor:

- A reading of 1 ppm (1-minute average) triggers internal investigation as to potential causes of the event
- A reading of 5 ppm over a period of 4 hours triggers operator to be deployed to the site to determine the cause and implement corrective action as necessary
- A reading of 5 ppm over 12 hours triggers extended internal investigation, notification to APCD and the Local Government, Proximate Local Government as applicable

[Quoted text hidden]

2 attachments



DeHaan N_Photometric Plan.pdf
1409K



DeHaan Traffic Counts.xlsx
14K

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Tue, Mar 23, 2021 at 12:52 PM

Thanks Jennifer,
I will let you know if I have additional questions.

Rebecca
[Quoted text hidden]

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Thu, Mar 25, 2021 at 12:20 PM

Jennifer,
For the Odor question, I'm actually referring to when the rods are brought out of the hole during the drilling process. Will the rods be wiped down?

Thanks,
Rebecca

For the Odor BMP:

- Will rods be wiped down during tripping operations?

NRO does not use rod pumping, we utilize a gas lift compressor for artificial lifting once the production levels require its use. Please clarify if this is not what you were referring to.

[Quoted text hidden]

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Thu, Mar 25, 2021 at 2:04 PM

Rebecca, after talking with my Ops team on this, it doesn't sound like there are any 'rods' that we use during the drilling process. However, we do immediately wipe down the drill pipe (maybe what you are referring to as rods?) as it is being tripped out of the hole with a rubber gasket-type device that returns the mud to the closed loop system.

Apologies for the confusion on our part – maybe just a difference of terminology tripping us up.

[Quoted text hidden]

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Fri, Mar 26, 2021 at 8:32 AM

Jennifer,
Yes, that was my question, rods, tubes, pipe, but during the drilling process of bringing them back out of the hole.

Thank you,
Rebecca

[Quoted text hidden]

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Tue, Apr 6, 2021 at 5:07 PM

Jennifer,
Two more questions as COGCC is reviewing the BMPs and incorporating them into the Sundry.

For odor, you commented that the odor BMP has 1-4 in place and #3 is odor neutralizers. Will additional or different odor neutralizers be used if the first are not effective or adding more?

For the air monitoring, would NRO inform COGCC if any of the response levels are triggered?

Thanks,
Rebecca

[Quoted text hidden]

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Wed, Apr 7, 2021 at 11:09 AM

Rebecca, please see responses below in **blue**.

Thanks!

Jennifer

303-406-1117

jennifer.lind@nickelroadoperating.com

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Tuesday, April 6, 2021 5:08 PM
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>
Subject: Re: Dehaan North Location 460556

Jennifer,

Two more questions as COGCC is reviewing the BMPs and incorporating them into the Sundry.

For odor, you commented that the odor BMP has 1-4 in place and #3 is odor neutralizers. Will additional or different odor neutralizers be used if the first are not effective or adding more?

My apologies – I misstated the intent of the listed considerations in my last note. 1, 2 and 4 will be employed proactively on all locations. 3 (odor neutralizers) will be reactive based on any complaints received as discussed previously. That portion of the odor BMP could be tweaked a bit to avoid this confusion. Please let me know if you would like me to revise.

For the air monitoring, would NRO inform COGCC if any of the response levels are triggered?

Yes, I will add COGCC to the notice list for trigger #3 (5 ppm over 12 hours). Future plans furnished to the APCD for approval will include COGCC as a notice party.

Thanks,

Rebecca

[Quoted text hidden]

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Wed, Apr 7, 2021 at 2:17 PM

Jennifer,

Thank you for the response. Please revise the Odor BMP. Below is what is currently on the Sundry. Please provide clarification on the parts highlighted in yellow.

"Odor Mitigation BMP: Operator will use Group I OBM. Odors will be managed by using 1) a closed loop OBM system, 2) a closed loop solids control system, 3) odor neutralizers, and 4) cuttings will not be allowed to accumulate on Location. Settling time and resulting odors will be minimized through, at a minimum, daily removal and daily offsite disposal of cuttings at a commercial facility. Should odor complaints persist during active drilling operations, operator will employ drying shakers and screen pulse for cuttings to return the maximum amount of fluid back into the closed-loop mud system rather than settling in the cuttings. Should odor complaints continue further, drilling operations will

cease until such time the operator employs odor neutralizing additives to the OBM system and / or switches to an alternative OBM system with lower odor potential. Drill pipe is immediately wiped down coming out of the hole with a rubber gasket-type device that returns the mud to the closed loop system."

I will add the information for the air monitoring plan.

Please let me know if you have questions.

Thank you again,

Rebecca

[Quoted text hidden]

Jennifer Lind <jennifer.lind@nickelroadoperating.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Wed, Apr 7, 2021 at 2:35 PM

Rebecca, here is the updated BMP language. This can replace the entirety of the statement included in the Sundry. Please let me know if you have any additional questions on this.

Odor Mitigation BMP: Operator will use Group I OBM. Odors will be managed by: 1) utilizing a closed loop OBM system, 2) utilizing a closed loop solids control system, 3) drill pipe will be immediately wiped down upon coming out of the hole with a rubber gasket-type device that will return the mud to the closed loop system, and 4) cuttings will not be allowed to accumulate on location - settling time and resulting odors will be minimized through, at a minimum, daily removal and daily offsite disposal of cuttings at a commercial facility. Should an odor complaint be received during active drilling operations, operator will apply odor neutralizing additives to the OBM system and will utilize drying shakers and screen pulse for cuttings to return the maximum amount of fluid back into the closed-loop mud system rather than settling in the cuttings. Odor neutralizing additives will be kept on location throughout drilling operations for immediate deployment should conditions warrant. Should odor complaints continue further, drilling operations will cease until such time the operator switches to an alternative OBM system with lower odor potential.

[Quoted text hidden]

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
To: Jennifer Lind <jennifer.lind@nickelroadoperating.com>

Wed, Apr 7, 2021 at 3:17 PM

Thank you.

[Quoted text hidden]