



STATE OF
COLORADO

Andrews - DNR, Doug <doug.andrews@state.co.us>

COGCC Form 2B review - Bayswater Exploration's Blehm 18-I Pad (Doc #402650999) - Response to Comments

1 message

Ann Feldman <afeldman@ascentgeomatics.com>

Tue, Sep 21, 2021 at 12:01 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Mark Brown <mbrown@bayswater.us>

Cc: Stephen Schwarz - DNR <stephen.schwarz@state.co.us>, Melissa Housey - DNR <melissa.housey@state.co.us>, Justin Garrett <jgarrett@ascentgeomatics.com>, Jordan Lukasik <jlukasik@ascentgeomatics.com>, Barbara Westerdale <bwesterdale@ascentgeomatics.com>

Good morning, Doug,

Bayswater respectfully submits the following documentation in response to COGCC staff technical review comments on the **Form 2B** for the Blehm 18-I Pad.

Attached:

Blehm_Form2B_TechnicalReviewResponseToComments_09202021

E21040 - BAYS - Blehm NIA - 2021.09.02

Please let us know if you have any questions.

Many thanks,

a

Ann L Feldman

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Friday, September 3, 2021 2:27 PM
To: Mark Brown <mbrown@bayswater.us>; Regulatory Distribution List <regulatory@Ascentgeomatics.com>
Cc: Stephen Schwarz - DNR <stephen.schwarz@state.co.us>; Melissa Housey - DNR <melissa.housey@state.co.us>
Subject: COGCC Form 2B review - Bayswater Exploration's Blehm 18-I Pad (Doc #402650999)

Mark, Ann, & Justin,

COGCC staff have conducted a technical review of Bayswater Exploration's Blehm 18-I Pad Form 2B and have identified the following issues.

1) In the Noise Impacts section on the Oil & Gas Location Data tab, the operator is instructed to provide a qualitative evaluation of incremental adverse noise impacts to the surrounding receptors during both the pre-production and production stages. It appears that only a quantitative measure (expected decibel levels) were provided instead. Provide an evaluation of the sources of adverse noise impacts during the pre-production and production stages of the Oil & Gas Location. The evaluation should also include a discussion of the site specific surrounding receptors, the time of day these adverse impacts will occur, an estimation of their duration, and the impacts after minimization/mitigation measures are in place for the nearby receptors.

2) For the Light and Odor Impact sections, provide an evaluation, for both pre-production and production stages of activity, of the impacts after minimization/mitigation measures are in place for the different receptors.

3) The Light Impact evaluation during the production stage includes what appears to be the following Best Management Practice: "Lighting will be timer controlled to eliminate full time dusk to dawn lighting on the location." This should be moved to the Mitigation Measures section of the Form 2B. Please let me know if this is acceptable.

4) In the Beneficial Impacts section Bayswater has indicated that removal of two wells and one common tank battery will reduce **all** potential emissions and traffic to the surrounding community and that might disturb the surrounding wildlife and ecosystems. Use of the term "**all**" is misleading and not accurate. Either the word "**all**" should be removed or clarifying language added indicating only those potential emissions associated with the two wells and common tank battery.

5) In the Beneficial Impacts section concerning beneficial impacts to the surrounding wildlife and ecosystems Bayswater has only used the statement concerning reduction of emissions. An evaluation should also be provided discussing the beneficial impacts to the surrounding wildlife and ecosystem resulting from reclaiming these oil and gas locations and the Access Road which will lead to the creation/restoration of wildlife habitat and reducing wildlife habitat fragmentation.

6) In the Public Health Resources section of the Oil & Gas Location Data tab Bayswater has answered "None anticipated" for the two questions requiring a qualitative evaluation of any potential acute or chronic, short- or long-term incremental impacts to public health as a result of the total pre-production and annual production hazardous air pollutant emissions. None anticipated is not a sufficient evaluation by itself. While the conclusion may be "none anticipated", the evaluation should explain why/how that conclusion was reached.

7) In the Existing Oil & Gas section of the Oil & Gas Location Data tab where total permitted capacity of on-location storage tanks within 1-mile of the Oil & Gas Location is summarized, Bayswater has indicated there are 0 permitted oil storage tanks and 15 existing oil storage tanks. This suggests there are unpermitted oil tanks within 1-mile of the proposed location. In instances where there are existing oil and gas locations that pre-date the Form 2A process, they will likely have tanks on them that won't necessarily be "permitted via a Form 2A", and so they might not be listed on the Location Scout Card. In these instances, we ask that an Operator use the existing tank count as the permitted count, as the location that pre-dates the Form 2A is presumed to have been considered/reviewed for at least the existing tank count.

8) After reviewing the Air Resources and Public Health sections of estimated emissions on the Oil & Gas Location Data tab, we have some clarifying questions as to how the estimates for the separator emissions were calculated.

- What is the type and manufacturing specification for the planned separator equipment?
- What is the emission factor used and the source of the emission factor for this

estimation?

- What is the planned emission control device(s) for the separators?

- Are the values provided:

a) emissions from venting of natural gas from the separator (to a combustor); OR

b) emissions from the separator burners themselves (i.e. emissions from the heating unit within the separator)?

The intent of this emissions question on the Form 2B is to align with the CDPHEs Air Pollution Control Division (APCD) production equipment emissions inventory sheet, which is asking about "Routine Separator Venting or Flaring" (Note: If separator emissions are a result of a malfunction, abnormal event, or other activity besides routine venting as a part of normal operation, report these emissions under the "Venting or Blowdowns" section.). With this in mind, are the emissions estimates provided correct for "Routine Separator Venting or Flaring"? If not, please provide updated information for us to adjust these separator emissions numbers with.

From Production Inventory guidance:

Separators

Emissions from all routine separator venting for separators operating at oil and natural gas operations in the state of Colorado must be reported using the Separators tab. See important note below on reporting.

Separator Types covered in this Spreadsheet Tab:

1) High, Low, HLP, Combined, Blooded

2) VRT

3) Liquid-Liquid (Water-Oil)

4) Other (specify)

Disaggregation:

Report emissions on a per-separator-type, per-control (or not-controlled), per-workover basis, per facility. Aggregation may only be done for separators that meet the criteria in Section 3.

IMPORTANT NOTE ON REPORTING SEPARATOR EMISSIONS:

- Report separator emissions based on the cause of the emissions. Report routine separator venting and leaking in this tab. If separator venting or flaring occurred due to other reasons such as abnormal operation or for maintenance/safety, it may be reported separately on the "Venting or Blowdowns" tab.

This Form 2B was jointly reviewed by several members of the OGLA group. If you have any questions, as the Lead OGLA for the Bayswater Blehm 18-I Pad OGDP, please contact me and I will confer with them. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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2 attachments



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2838K



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