

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

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**COGCC Form 2A review - Bayswater Exploration's Blehm 18-I Pad (Doc #402580742)  
- Response to Comments**

1 message

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**Ann Feldman** <afeldman@ascentgeomatics.com>

Tue, Sep 21, 2021 at 11:59 AM


To: "Andrews - DNR, Doug" &lt;doug.andrews@state.co.us&gt;, Mark Brown &lt;mbrown@bayswater.us&gt;

Cc: Justin Garrett &lt;jgarrett@ascentgeomatics.com&gt;, Jordan Lukasik &lt;jlukasik@ascentgeomatics.com&gt;, Barbara Westerdale &lt;bwesterdale@ascentgeomatics.com&gt;

Good morning, Doug,

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










Attached:

 Blehm\_Form2A\_TechnicalReviewResponseToComments\_09202021





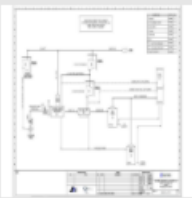




Since the size of the revised Plans are too large to send in this email, we have created a folder on the Ascent Sharefile site for you to access:

Link: <https://petro-fs.sharefile.com/d-sdba03f52676c48ed9a92cf92b82aa2f9>

There are 9 documents:

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-  BEP\_WMP\_OGDP\_07282021
  -  Blehm18-IPad\_DustMitigationPlan
  -  Blehm18-IPad\_LightingPlan
  -  Blehm18-IPad\_OdorMitigationPlan
  -  Blehm18-IPad\_ProcessFlowDiagrams\_revised09212021
  -  Blehm18-IPad\_SubEquivInfo\_CoverSheet\_ConstructionLayoutDrawings
  -  Blehm18-IPad\_SubEquivInfo\_CoverSheet\_TransportationPlan
  -  Blehm18-IPad\_WaterPlan
  -  Blehm18-IPad\_Wildlife\_Protection\_Plan

This is what the folder looks like when you click the Sharefile link:

			
BEP_WMP_OGDP_0728...	Blehm18-IPad_DustMiti...	Blehm18-IPad_Lighting...	Blehm18-IPad_OdorMiti...
219 KB	2 MB	16 MB	235 KB
			
Blehm18-IPad_ProcessF...	Blehm18-IPad_SubEqui...	Blehm18-IPad_SubEqui...	Blehm18-IPad_WaterPla...
234 KB	12 MB	4 MB	195 KB
			
Blehm18-IPad_Wildlife_...			
2 MB			

Please let us know if you have any questions.

Many thanks,

a

Ann L Feldman

Regulatory Manager

Ascent Geomatics Solutions (Formerly PFS)

8620 Wolff Court

Westminster, Colorado 80031

Office: 303.928.7128

Cell: 720.245.5707

TBPLS Firm Registration No. 10194123



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**From:** Andrews - DNR, Doug <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>  
**Sent:** Thursday, September 2, 2021 9:30 AM  
**To:** Mark Brown <[mbrown@bayswater.us](mailto:mbrown@bayswater.us)>; Regulatory Distribution List <[regulatory@Ascentgeomatics.com](mailto:regulatory@Ascentgeomatics.com)>  
**Subject:** COGCC Form 2A review - Bayswater Exploration's Blehm 18-I Pad (Doc #402580742)

Mark, Ann, & Justin,

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

1) In the Equipment and Flowlines tab, Bayswater has indicated there will be 25 separators on this proposed Oil & Gas Location. This is also reflected in the facility drawings. However, there are several Plans that indicate 26 separators in their introductory Facility Information section. The Plans that indicate there will be 26 separators are: Noise Mitigation Plan, Odor Plan, Operations Safety Management Plan, Fluid Leak Detection Plan, Interim Reclamation Plan, Cumulative Impacts Plan, and the Community Outreach Plan. Please confirm the number of separators planned for this Oil & Gas Location and provide either revisions to the Plans listed above or revised facility drawings.

2) In the Equipment and Flowlines tab, Bayswater has indicated there will be no Vapor Recovery Units (VRUs) on this proposed Oil & Gas Location. This is also reflected in the facility drawings. However, there are several Plans that indicate 4 VRUs in their introductory Facility Information section. The Plans that indicate there will be 4 VRUs are: Dust Mitigation Plan and the Water Plan. Please confirm the number of separators planned for this Oil & Gas Location and provide either revisions to the Plans listed above or revised facility drawings.

3) The Light Mitigation Plan only includes light impacts during the production phase of operations. There is no examination of light impacts during the pre-production (construction, drilling, or completion) phases of operations. Please provide supplemental information per COGCC Rule 424.a.(2).A. that examines what light impacts will occur during pre-production (construction, drilling, or completion) phases of operations.

4) The Odor Mitigation Plan does not clearly and explicitly indicate what the Odor mitigation BMPs will be employed for this proposed Oil & Gas Location. Please provide a section to this Plan that lists/summarizes all Odor mitigation BMPs.

5) The Dust Mitigation Plan does not include discussion concerning truck trips for the production phase of operations. Please revise this Plan to include this information.

6) The Transportation Plan does not clearly and explicitly indicate what transportation related mitigation BMPs will be employed for this proposed Oil & Gas Location. Please provide a section to this Plan that lists/summarizes all transportation related mitigation BMPs.

7) In discussing the disposal of water-based bentonitic drilling fluids, the Waste Management Plan indicates they will be hauled off and disposed of at a properly permitted commercial waste facility per Rule 903.d.(3). Rule 903.d.(3) discusses disposal in pits or Land Application. Rule 905.d.(2) is the Rule discussing disposal at a commercial Solid Waste Disposal facility. Please revise this section of the Waste Management Plan to reference the correct Rule. Similarly, the statement about disposal of oily waste/tank bottoms being disposed at properly permitted commercial waste facility references Rule 905.d. However, Rule 905.e. is the Rule that discusses this method of oily waste disposal. Please also revise this section of the Waste Management Plan to reference the correct Rule.

8) The Production Process Flow Diagram depicts four VRUs (2 HP VRUs & 2 LP VRUs); however, no VRUs are indicated in the Site Equipment tab of the Form 2A. Please

confirm the count of VRUs and revise the Production Process Flow Diagram if necessary.

9) During my review of the Form 2A and the various Plans and attachments, there was mention that the Belmont Farms HomeOwners Association to the west requested visual impact mitigation measures be employed by Bayswater. However, I did not see any visual impact mitigation measure BMPs included on the Form 2A that address their concerns. Please provide visual impact mitigation BMPs and I will add them to the Form 2A.

The related Form 2B Cumulative Impacts Data Identification for this Oil & Gas Development Plan is still being reviewed by COGCC staff. Any concerns/issues identified during OGLA staff's technical review of the Form 2B will be sent to you in a separate correspondence. I anticipate our review of the Form 2B will be completed within the next few days.

Because this Form 2A must be heard before the Commission due to Rule 604.b.(4) being applied, I anticipate the Commissioners will be inquiring as to the nature and extent of Bayswaters engagement with the nearby Residential Building Unit owners. Given that there are only nine RBU owners within 2,000 feet, the question as to obtaining informed consent from them will likely need to be addressed. Any information you can provide to that effect will be useful in preparing the Director Recommendation to the Commission.

If you have any questions, please feel free to contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



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

303.894.2100 Ext. 5180

1120 Lincoln St., Suite 801, Denver, CO 80203

[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us) | <http://cogcc.state.co.us/>



**Blehm\_Form2A\_TechnicalReviewResponseToComments\_09202021.pdf**  
118K