

**STATE OF
COLORADO**

Noto - DNR, John <john.noto@state.co.us>

Kerr McGee, Kerbs 31N-14HZ, Form 2A #400444568

4 messages

Noto - DNR, John <john.noto@state.co.us>

Mon, Oct 7, 2013 at 4:44 PM

To: "Kucera, Lauren" <lauren.kucera@anadarko.com>

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Lauren,

Per our phone conversation this morning, COGCC is requesting additional information or clarification of the following items on the above referenced Form 2A.

- 1) Oil based drilling fluid use is indicated. Please provide details about mud disposal or recycle/reuse plans which will be entered on the form as Best Management Practices. If land application or treatment is planned, then the oil-based fluid must be addressed on the Waste Management Plan.
- 2) If processing/treatment of oil-based drilling fluid at the Oil and Gas Location is planned, then surface owner consent is required per Rule 907.e.(2)G.
- 3) There is a comment on the Form 2A that: "Tank Battery is under negotiation with surface owner and will be filed at a later date." COGCC is requesting that the Form 2A is submitted for the production facilities prior to approval of the Form 2A for the wells. If there are timing conflicts, then evidence that pre-application notices were submitted and a surface use agreement is in place for the tank battery is acceptable.
- 4) Due to the proximity to the residence to the east, please provide Best Management Practices that address mitigation measures for: noise, odors, light, and dust. These BMPs should also be implemented at the Kerbs 32C-14HZ due to the proximity of the residence to the south.
- 5) The location drawing shows planned wells in the southeastern corner of the planned disturbance area. Typical layouts have the wells located in the center to provide working room around the rig. Please provide an equipment layout that shows how the proposed disturbance boundaries will be adhered to.
- 6) There is a comment on the Form 2A: "1 Existing and 3 New Wells into tank battery", please clarify whether the existing Noble Energy Kerbs T 13-01 well at this amended location will share the same tank battery as the three wells related to this Form 2A.

Please respond with an email to address these issues. Feel free to call if you have questions or concerns.

Best Regards,

John

—

John Noto, P.G.
Oil and Gas Location Specialist
Colorado Oil and Gas Conservation Commission
 [\(303\) 894-2100 ext. 5168](tel:3038942100)

Greg Deranleau - DNR <Greg.Deranleau@state.co.us>
To: John Noto - DNR <john.noto@state.co.us>

Wed, Oct 9, 2013 at 7:43 AM

John,

Thanks. I like this correspondence. Very clear and direct, follows up a phone call. Please copy the permitter upstairs on these items, just to keep them in the loop.

We may get push back on the BMPs for the offsite residence, because this was under the old rules, but as long as we cite public health, safety & welfare, we should be good. I would expect Anadarko to step up on this anyway.

Thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
Colorado Oil and Gas Conservation Commission
[303-894-2100 ext. 5153](tel:3038942100)

From: Noto - DNR, John [mailto:john.noto@state.co.us]
Sent: Monday, October 07, 2013 4:44 PM
To: Kucera, Lauren
Cc: Greg Deranleau - DNR
Subject: Kerr McGee, Kerbs 31N-14HZ, Form 2A #400444568

[Quoted text hidden]

Noto - DNR, John <john.noto@state.co.us>
To: Penny Garrison - DNR <penny.garrison@state.co.us>

Wed, Oct 9, 2013 at 11:32 AM

----- Forwarded message -----
From: **Noto - DNR, John** <john.noto@state.co.us>

Date: Mon, Oct 7, 2013 at 4:44 PM

Subject: Kerr McGee, Kerbs 31N-14HZ, Form 2A #400444568

[Quoted text hidden]

[Quoted text hidden]

Kucera, Lauren <Lauren.Kucera@anadarko.com>

Tue, Oct 15, 2013 at 2:07 PM

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

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Hello John,

- 1.) Oil based drilling fluid is never treated or applied onsite. It is hauled offsite to the fluids manufacturer for re-conditioning or disposed of at a licensed commercial disposal site.
- 2.) Please see #1
- 3.) The tank battery is still under negotiation with the surface owner, but we anticipate negotiations being finalized by the end of the month. If we want to drill these wells, and complete them after the tank battery is approved, is it possible to obtain approval prior to the tank battery 2A submittal?
- 4.) Weld County Roads 13 and 34 are paved and maintained by Weld County and will not require further dust mitigation. Water will be placed on the dirt access roads and location as needed to mitigate dust. If the access roads require further dust abatement, Magnesium chloride will be used. A ditch and berm will be constructed around the entire location. Sound mitigation barriers (hay bales) will be placed along the eastern and northern sides of the pad location to dampen noise and potential visual disturbance during drilling and completions to the nearby residence and to Weld County Roads 13 and 34. All lights used for operations will be pointed inward to mitigate potential light disturbance. Vapor Recovery Units (VRU) will be utilized to prevent uncontrolled venting of flash gas and to suppress odors related to flaring gas.
- 5.) I've spoken with our Drilling Foreman, and he has indicated that we will be able to remain completely within the disturbed area during drilling operations. The rig has adequate room to lay down to the north of the wells. These wells were placed at the SE corner of the pad to allow enough space for Noble to operate their existing Kerbs T 13-01 well to the northwest. This location was negotiated with the surface owner.
- 6.) The existing Noble Energy Kerbs T 13-01 well will not share the same tank battery. The proposed tank battery will be co-located near the existing Noble facility.

I apologize for the discrepancies on the permits you have received. We are working though them and hope this will not be an issue on permits you are receiving now and will receive in the future. I know this takes a lot of your time.

Thank you,

Lauren Kucera

Regulatory Affairs – Rockies GWA

Anadarko Petroleum Corporation

(720) 929-6107 - Direct

From: Noto - DNR, John [mailto:john.noto@state.co.us]
Sent: Monday, October 07, 2013 4:44 PM
To: Kucera, Lauren
Cc: Greg Deranleau - DNR
Subject: Kerr McGee, Kerbs 31N-14HZ, Form 2A #400444568

Lauren,

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- 1) Oil based drilling fluid use is indicated. Please provide details about mud disposal or recycle/reuse plans which will be entered on the form as Best Management Practices. If land application or treatment is planned, then the oil-based fluid must be addressed on the Waste Management Plan.
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- 3) There is a comment on the Form 2A that: "Tank Battery is under negotiation with surface owner and will be filed at a later date." COGCC is requesting that the Form 2A is submitted for the production facilities prior to approval of the Form 2A for the wells. If there are timing conflicts, then evidence that pre-application notices were submitted and a surface use agreement is in place for the tank battery is acceptable.
- 4) Due to the proximity to the residence to the east, please provide Best Management Practices that address mitigation measures for: noise, odors, light, and dust. These BMPs should also be implemented at the Kerbs 32C-14HZ due to the proximity of the residence to the south.
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Please respond with an email to address these issues. Feel free to call if you have questions or concerns.

Best Regards,

John

—

John Noto, P.G.

Oil and Gas Location Specialist

Colorado Oil and Gas Conservation Commission

(303) 894-2100 ext. 5168

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