

STATE OF
COLORADO

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

Tabula Rasa Andreatta Variance Request

14 messages

krodell@upstreampm.com <krodell@upstreampm.com>
To: Greg Deranleau - DNR <Greg.Deranleau@state.co.us>
Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Wed, Feb 12, 2014 at 11:48 AM

Greg,

My apologies for taking so long with this. We were trying to get as much pertinent information that would assist the Commission with their decision. Please review and let either Andrea or m know what your thoughts are. We would like to move forward with this location.

Thank you for your time.

Kim Rodell

President

7000 S. Yosemite Street, Suite 290B

Englewood, CO 80112

Phone: 303-942-0506

Cell: 720-271-6657

krodell@upstreampm.com

www.upstreampm.com



 **Andreatta 3 Variance Request - Setback to Overhead Power Revised 021214.pdf**
370K

Deranleau - DNR, Greg <greg.deranleau@state.co.us>
To: "krodell@upstreampm.com" <krodell@upstreampm.com>
Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Fri, Feb 21, 2014 at 10:10 AM

Thanks, Kim and Andrea.

I have attached this to the Form 2A and will discuss it with Director Lepore and let you know. I think you have made a good case for your need for the variance. Although Tabula Rasa is the owner of the utility lines, Director Lepore may still want a "waiver" of the setback from them. Probably unnecessary, but that would be how we would handle a property line setback variance, even if the same owner owned both sides of the line, so there is precedent.

During my review of this location last fall, I noted that the county road comes down a very steep pitch, which although south facing, seemed to be very shaded. I believe I mentioned this to you in our previous discussions and would like to get an indication of what measures the operator could take during equipment mobilization, water hauling, and/or other high truck traffic activities to make sure that a) they don't tear up the road when it is muddy, and b) they prevent accidents with local or "oil field" traffic when the road is snowy or icy.

I will let you know the outcome of my discussion with Matt; please address the access issue with your client and let me know what you work out. I trust that the bridge issue remains resolved from the other location.

Thanks,

[Quoted text hidden]

—

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

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

Fri, Feb 21, 2014 at 10:14 AM

To: Matt Lepore - DNR <matt.lepore@state.co.us>, Larry Coler - DNR <larry.coler@state.co.us>

Hi Matt,

This location was proposed way back in September, and we asked the operator to explore some other alternatives rather than the overhead utility line setback variance request. They have done so, but have come back with the variance being their best option. Their 502.b. request appears to be fully explained, and based on all considerations, I recommend you approve it. If you have any questions based on your read/review of the request let me know. The only thing they did not provide is a waiver from the utility owner, but the operator is the owner as stated in the attached request.

I will be available to talk with you next week if you'd like.

Thanks,

[Quoted text hidden]

—

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



Andreatta 3 Variance Request - Setback to Overhead Power Revised 021214.pdf

370K

Matt Lepore - DNR <matt.lepore@state.co.us>

Fri, Feb 21, 2014 at 12:21 PM

To: Greg Deranleau - DNR <greg.deranleau@state.co.us>, Larry Coler - DNR <larry.coler@state.co.us>

Greg & Larry:

The old safety setback was the greater of 150' or 1.5 X rig height. It does not appear to me they were in compliance with the old rule when they drilled the Andreatta #2, and they certainly don't comply with the old rule on the Andreatta #3. Neither the drawings nor their narrative make it clear to me how far away they could get by moving the proposed surface location. They also do not give me much in terms of the harm of shutting down the power line, at least during rig up and rig down. I am not eager to approve a variance and then have someone get electrocuted.

Please get answers to the following questions:

1. What is the farthest away from the line they can get without expanding the pad?
2. Why can't they turn off the power line for the time it takes to rig up and rig down (they can have power once the rig is up, until they are ready to take it down)?

Thanks,

Matt

Matthew Lepore

Director

Colorado Oil and Gas Conservation Commission

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]

Sent: Friday, February 21, 2014 10:14 AM

To: Matt Lepore - DNR; Larry Coler - DNR

Subject: Fwd: Tabula Rasa Andreatta Variance Request

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

Tue, Feb 25, 2014 at 9:24 AM

To: Matt Lepore - DNR <matt.lepore@state.co.us>

Cc: Larry Coler - DNR <larry.coler@state.co.us>

Matt,

The Andreatta 2 was spud in 2008, the gas plant that the utility serves was constructed along with the development of this CO2 field. Likely, the plant was still under construction or not on line at the time of drilling.

The permit approved in 2008 indicated 475 to the nearest building, public road, utility or railroad (and they indicated it was to CR 441).

Answer to # 1 is any new well will require a bit of a pad expansion. Due to the steep slopes off the pad to the south, the need for massive fill quantities increases as the surface hole locations moves farther away from the power lines. They are trying to limit this, due to cost of having to import fill, difficulty in slope stabilization and re-vegetation, and land-owner's preference.

Number 2 is a bit more complicated. We can ask them about a brief shut down for MIRU and Rig Down operations, but likely shutting down the plant will require shutting in all the wells in the field, discharging pressure

from various process equipment, stabilizing other equipment and fluids. Temperature and pressure controls are critical functions to the operations. Granted if they experienced an unexpected loss of power, they would have to deal with most of that, but from my experience, it is a big pain in the butt. In an emergency situation, all wells would flow to an emergency flare, and pressurized equipment would also vent to a flare, but when they are in control of a shut down they do it more methodically. It is possible that they have a back up generator, but i kind of doubt it for this size of operation.

I will ask them to look into a "brief interruption of power during MIRU and Rig Down."

Thanks.

[Quoted text hidden]

Deranleau - DNR, Greg <greg.deranleau@state.co.us>
To: "krodell@upstreampm.com" <krodell@upstreampm.com>

Tue, Feb 25, 2014 at 9:28 AM

Kim,

I have had Matt take a look at this, and he is still concerned about the power line. To quote him: "I am not eager to approve a variance and then have someone get electrocuted." He has asked if a brief power interruption would be possible during MIRU and Rig Down, which we view as the most likely time to have an incident that would have the potential to affect the power lines. Does the plant have a backup generator that could be kicked in for hours, but would allow the rig to mobilize and set up, but you could go back to your main power source during drilling and completion, then kick back over while you drop the mast and move out? Alternatively would it be possible to stabilize the plant during such a "brief" interruption of power if no back up is available?

Thanks for looking into this.

[Quoted text hidden]

—

Greg Deranleau
Oil and Gas Location Supervisor
Colorado Oil and Gas Conservation Commission
303-894-2100 ext. 5153

Matt Lepore - DNR <matt.lepore@state.co.us>
To: Greg Deranleau - DNR <greg.deranleau@state.co.us>
Cc: Larry Coler - DNR <larry.coler@state.co.us>

Tue, Feb 25, 2014 at 11:00 AM

Thanks, Greg. Mostly want to make sure we are covering all of our bases before approving.

Matthew Lepore

Director

Colorado Oil and Gas Conservation Commission

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]
Sent: Tuesday, February 25, 2014 9:24 AM
To: Matt Lepore - DNR
Cc: Larry Coler - DNR
Subject: Re: Tabula Rasa Andreatta Variance Request

[Quoted text hidden]

krodell@upstreampm.com <krodell@upstreampm.com>
To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>

Tue, Feb 25, 2014 at 12:28 PM

Thanks Greg. Powering down during the rig moves may be an option. Tabula is discussing. Also, I would assume that this does NOT include the completion rig, correct? Just confirming. If we chose the power down option, I will revise the request to include that information. Thank you for taking this to Director Lepore.

Kim

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]
Sent: Tuesday, February 25, 2014 9:29 AM
To: krodell@upstreampm.com
Subject: Re: Tabula Rasa Andreatta Variance Request

Kim,

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Deranleau - DNR, Greg <greg.deranleau@state.co.us>
To: "krodell@upstreampm.com" <krodell@upstreampm.com>

Tue, Feb 25, 2014 at 5:03 PM

Kim,
Thanks for looking into this! What will they be using for completions? What's the mast height? For the purposes of the old setback rule scenario, the completions rigs would be good to go if the drill rig was, because they would be assumed to be shorter. This would be the first time i've considered that question under the new Rules, so i am not quite sure how to handle it. we will think about it and discuss here.

Thanks,

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krodell@upstreampm.com <krodell@upstreampm.com>
To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>
Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Thu, Feb 27, 2014 at 1:09 PM

Greg,

It sounds as if Tabula is very amicable for a plant shut-down in the summer. We can keep the location as originally requested. Will you put the shut-down MIRU and Rig Down as a COA or should we amend the request again? Also, the completion rig height is significantly shorter and I cannot image that this would include completion rigs. So let us know what we need to do to move the process forward.

Thanks bunches!

Kim

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]

Sent: Tuesday, February 25, 2014 5:03 PM

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

Fri, Feb 28, 2014 at 7:35 AM

To: Matt Lepore - DNR <matt.lepore@state.co.us>

Cc: Larry Coler - DNR <larry.coler@state.co.us>

Matt,

It sounds like the operator will be willing to temporarily de-energize the power lines during MIRU and Rig Down.

Can I proceed with the following COA:

As a condition of approval to the variance requested to reduce the safety setback to the overhead utility, Operator shall temporarily de-energize the overhead power lines to the north of the Oil and Gas Location that feed the gas plant during Rig Move In, Rig Up (MIRU) and during rigging down operations for their drill rig.

Thanks for your help.

Greg

On Fri, Feb 21, 2014 at 12:21 PM, Matt Lepore - DNR <matt.lepore@state.co.us> wrote:

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Lepore - DNR, Matt <matt.lepore@state.co.us>

Fri, Feb 28, 2014 at 1:14 PM

To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>

Yes. Thank you for working through this.

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Greg Deranleau

Oil and Gas Location Supervisor

Colorado Oil and Gas Conservation Commission

[303-894-2100](tel:303-894-2100) ext. 5153

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Matt Lepore

Director, COGCC

Sent from Gmail Mobile

Deranleau - DNR, Greg <greg.deranleau@state.co.us>
To: "krodell@upstreampm.com" <krodell@upstreampm.com>
Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Mon, Mar 3, 2014 at 7:36 AM

Kim,
It looks like we can get the variance approved with the following COA:

As a condition of approval to the variance requested to reduce the safety setback to the overhead utility, Operator shall temporarily de-energize the overhead power lines to the north of the Oil and Gas Location that feed the gas plant during Rig Move In, Rig Up (MIRU) and during rigging down operations for their drill rig.

Can you also provide a response to the issue of the steep road from my 2/21 email and indicate that the bridge is not a problem for mobilization.

Thanks,
Greg
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krodell@upstreampm.com <krodell@upstreampm.com>
To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>
Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Thu, Mar 13, 2014 at 9:36 AM

Greg,

Tabula Rasa will access the Andreatta on the same road that was used for the Caddell 2 well and crosses the same bridge so the bridge will not be a problem for mobilization. Tabula Rasa is planning on drilling this well in the summer which is when they can safely shut down power to the plant for rig mobilization (both in and out). The steep road will not be an issue as there will be no snow or ice on the roads this time of year. This road has been accessed by heavy equipment in the past for the drilling of previous wells and will be utilized again for the drilling of the Andreatta 2.

Tabula Rasa will abide by the COA listed below and looks forward to the APD and OGLA approval.

Please let me know if you need more.

Thanks!

Kim

From: Deranleau - DNR, Greg [mailto:greg.deranleau@state.co.us]
Sent: Monday, March 03, 2014 7:37 AM
To: krodell@upstreampm.com
Cc: Agross@upstreampm.com

3/13/2014

State.co.us Executive Branch Mail - Tabula Rasa Andreatta Variance Request

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