



STATE OF  
COLORADO

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

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## Tabula Andreatta 3 APD and OGLA

7 messages

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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>

Wed, Mar 26, 2014 at 11:11 AM

Greg,

Sorry about this, but I spoke with Tabula and they want to see if we can get the language in the COAs to state that the power to the line within 200' will be shut down only while rigging up and down and not necessarily the move in and out. They would like to shut down the power to the lines while they are raising the derrick and securing all guide wires. This is the critical time to ensure the rig is secured and there are no accidents. They are not sure they want to shut down the power for 2-3 days during a move in/out if there is nothing going on and the derrick is just laying down. Can you confirm?

Also, we are getting the final drawings from the surveyor. You will have that shortly.

Thanks!

Kim Rodell

President

7000 S. Yosemite Street, Suite 290B

Englewood, CO 80112

Phone: 303-942-0506

Cell: 720-271-6657

[krodell@upstreampm.com](mailto:krodell@upstreampm.com)

[www.upstreampm.com](http://www.upstreampm.com)



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

Fri, Mar 28, 2014 at 8:58 AM

Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>

Provide your suggested language, if acceptable to the Director, i can put it in as a BMP.

[Quoted text hidden]

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Greg Deranleau

Oil and Gas Location Assessment Supervisor



P 303.894.2100 x5153

1120 Lincoln Street, Suite 801, Denver, CO 80203

[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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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>

Fri, Mar 28, 2014 at 10:32 AM

Greg,

Thank you. Also attached is the reclamation plat. The total disturbed are for the drilling of the well, including the existing, is 1.3 acres. The reclaimed portion will be 0.8 acres. Let me know if you have any questions on this.

Thanks!

Kim

**From:** Deranleau - DNR, Greg [mailto:[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)]  
**Sent:** Friday, March 28, 2014 8:58 AM  
**To:** [krodell@upstreampm.com](mailto:krodell@upstreampm.com)  
**Cc:** [Agross@upstreampm.com](mailto:Agross@upstreampm.com)  
**Subject:** Re: Tabula Andreatta 3 APD and OGLA

[Quoted text hidden]

 **ANDREATTA 3 RECLAMATION DWG 3-28-14.pdf**  
34K

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

Mon, May 12, 2014 at 6:37 PM

To: "krodell@upstreampm.com" <krodell@upstreampm.com>

Cc: "Agross@upstreampm.com" <Agross@upstreampm.com>, Larry Coler - DNR <larry.coler@state.co.us>, Melissa Housey - DNR <melissa.housey@state.co.us>

Kim & Andrea,  
Old business here. I know you were asking a little while ago.

As I see based on the numerous and lengthy e-mail chains and the comments and attachments in the Form 2 (**400475131**) and Form 2A (**400477005**) COGCC is expecting additional information on these applications in order to complete the final approval process.

1. On March 18, during the final approval process for this application, it was noted that several comments made to the application during the comment period had not been addressed in supplemental documentation, and I requested that the requests from the public and LGD be addressed. I provided the text of the comments to you on March 18 and have attached that to this e-mail (it is also included in the Form 2A as doc #1642177). The Form 2A was put ON HOLD pending your response.
2. In your e-mail of March 26, you requested modifications to the language of the COA which was necessary in order to get the variance to the setback from the powerline approved. On March 28, I requested that you propose alternative language as a BMP and I would take it to the Director; I have not received any alternative language. The COA currently reads: "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." The Form 2 was put ON HOLD on March 28.
3. Additionally, the following public comment was made on the Form 2 and has not been addressed: "(1) 305.g. Location Signage.As of Monday October 27, 2013 there was no sign visible on County Road 441 indicating the well site. (2) The well type on Form 2 is checked as oil.Since production records going back for many years on the Cogcc website show no oil production in the Oakdale field, the Gas Oil Ratio (GOR) seems not to meet the standard for an oil designation." The commentor later corrected the date of the signage observation to September 27, 2013.

Please provide the following information to address the above issues:

1. A description of Tabula Rasa's plans that address the concerns expressed in comments received from the public and LGD on the Form 2 and Form 2A.
2. Either a revised BMP that can be taken before Director Lepore or a statement accepting the COA as currently written.

Please provide the requested information in reply to this email by May 30, 2014 so that we can get this approved for you. Otherwise, I think we should withdraw this application.

Thanks.

[Quoted text hidden]

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Greg Deranleau

Environmental Manager



P 303.894.2100 x5153

1120 Lincoln Street, Suite 801, Denver, CO 80203

[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**krodell@upstreampm.com** <krodell@upstreampm.com>

Thu, May 15, 2014 at 4:01 PM

To: "Deranleau - DNR, Greg" <[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)>

Cc: "Agross@upstreampm.com" <[Agross@upstreampm.com](mailto:Agross@upstreampm.com)>, Larry Coler - DNR <[larry.coler@state.co.us](mailto:larry.coler@state.co.us)>, Melissa Housey - DNR <[melissa.housey@state.co.us](mailto:melissa.housey@state.co.us)>

Greg,

As I see based on the numerous and lengthy e-mail chains and the comments and attachments in the Form 2 (**400475131**) and Form 2A (**400477005**) COGCC is expecting additional information on these applications in order to complete the final approval process.

1. On March 18, during the final approval process for this application, it was noted that several comments made to the application during the comment period had not been addressed in supplemental documentation, and I requested that the requests from the public and LGD be addressed. I provided the text of the comments to you on March 18 and have attached that to this e-mail (it is also included in the Form 2A as doc #1642177). The Form 2A was put ON HOLD pending your response.

***See below #1 below for comments.***

2. In your e-mail of March 26, you requested modifications to the language of the COA which was necessary in order to get the variance to the setback from the powerline approved. On March 28, I requested that you propose alternative language as a BMP and I would take it to the Director; I have not received any alternative language. The COA currently reads: "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." The Form 2 was put ON HOLD on March 28.

***See below #2 below for comments.***

3. Additionally, the following public comment was made on the Form 2 and has not been addressed: "(1) 305.g. Location Signage.As of Monday October 27, 2013 there was no sign visible on County Road 441 indicating the well site. (2) The well type on Form 2 is checked as oil.Since production records going back for many years on the Cogcc website show no oil production in the Oakdale field, the Gas Oil Ratio (GOR) seems not to meet the standard for an oil designation." The commentor later corrected the date of the signage observation to September 27, 2013.

***We have confirmed that there is a sign for the location by the Location Supervisor.***

***The permit was incorrectly checked as an oil well. This should be classified as a gas well and will produce CO2.***

Please provide the following information to address the above issues:

1. A description of Tabula Rasa's plans that address the concerns expressed in comments received from the public and LGD on the Form 2 and Form 2A.

Public:

I am the one who started the move-on petition. The purpose was to gain support to request a public meeting with Tabula Rasa. If some of the 142 petition signers contacted Director Lepore, it was on their own initiative, and not at my suggestion. In the absence of a response from Tabula Rasa to date, I request that approval of this permit be postponed until such a time that a meeting is held. There are a number of issues that need explanation, including these.

(1) Gas plant venting. Will this new well increase venting volume? What is being vented?

***The Gas Plant is covered under existing permits not issued by COGCC. If any venting occurs or will be necessary, Tabula Rasa will submit any necessary permits or amendments to the existing permits. Venting regulations are covered under by both COGCC and CDPHE .***

(2) Lighting. Will this well be illuminated at night?

***Yes, during the drilling and completions phases of the well, the well will be illuminated for safety purposes. Any lighting that is required during the drilling, completion or 24 hour operations will be shielded or cast inward to prevent glare on roadways.***

(3) Enhanced Oil Recovery. What is it? Will it be done in Huerfano County?

***It is a generic term for techniques for increasing the amount of crude oil that can be extracted from an oil field. The purpose for drilling the Andreatta 3 is to obtain CO<sub>2</sub> and use the produced CO<sub>2</sub> in Enhanced Oil Recovery Operations in other areas. Tabula Rasa will not be operating an Enhanced Recovery Project in Huerfano County.***

(4) The Blue Lake CO<sub>2</sub> pipeline. Where is it located?

***There is no mention of the Blue Lake CO<sub>2</sub> in the permit. Per my research the pipeline is located in South Central Colorado and has been previously permitted.***

(5) Local jobs and tax revenues. Is Huerfano County getting a fair deal?

***Tabula Rasa employs several residents and currently uses local contractors and local companies to source needs when possible. Colorado has a severance tax that is imposed upon nonrenewable natural resources that are removed from the earth. The tax is progressive and the rate increases with the volume of sales. Therefore, if there is more production occurring in Huerfano County, the tax rate will increase and the county will receive more money. In addition, if there is an increase in activity within a county, both the local economy and job rates benefit.***

LGD:

Correspondence from LGD to CDPHE regarding consultation request: there are 3 provisions that area residents have expressed concern about are

Public water system protection As I understand it the Concerns of area residents regarding the close proximity of water run off drainage to the proposed well locations fear the potential for contamination to these water ways in times of summer rains and spring run off. The surface water is 240 feet for the caddell and 260 feet for the andratta This drainage flows into middle creek Middle creek is sometimes used to augment water supply to Walsenburg I am not sure if this would be under public water system protection or stormwater management. In view of the

flooding up north recently there is a great concern that the caddell location is within the flood plain and there fore at risk to be damaged with contamination of waterways so close to the well site. We are seeking a proposal of safeguards (best management practices) at these well sites to prevent environmental insults in a flooding situation.

***Tabula Rasa has a Stormwater Management Plan (SWMP) that details all BMPs that may be implemented for erosion control and water run-off from the oil and gas location to prevent any run-off to be drained into Middle Creek or any other water source. The Master SWMP has been submitted to Huerfano County per the County Special Use Permit. It is also on hand at the location in the event a State Inspector would like to review the document.***

***According to the COGCC mapping tool, which was used to research the locations prior to submitting permits, the location is not within a Designated Groundwater Management, Designated Basin, or a Regulated 42 Aquifer.***

***Regarding the Caddell being within a Flood Plain, the Caddell permit has already been approved and the well has been drilled and completed.***

Odor and dust

The county roads leading to these well sites are dirt/gravel roads. These county roads are designed to carry passenger vehicles and pick up trucks some with trailers. The reality of travel characteristic of energy extraction is unique involving intense periods of very large and heavy vehicles. Drilling 2 wells involves approximately 500 truck trips, considerably more if stimulation techniques are used. Rig trucks have 20,000 to 30,000 times the load impact of a passenger car. With these figures in mind and the condition of the county roads leading to the well site it would be impossible to think that this traffic would not impact a substantial

increase in fugitive dust production. We would like the CDPHE to recommend practices the permit application operator could employ to mitigate this issue. It is felt that the amount of fugitive dust produce may be a nuisance and a health hazard especially considering a population in a previous coal mining area with respiratory issues being a major health concern in this area. The Colorado regional health profiles published by the CDPHE in 2010 reports age adjusted rate of mortality due to chronic lower respiratory disease in Huerfano county per 100,000 population is 83.1 as compared to the state at 51.4.

***Tabula Rasa has already agreed and it has been applied as a COA that they will "water the roads and wellsite as necessary to minimize dust and utilize speed control measures to reduce impacts from truck accessing the well sites." A Traffic Control Plan has been submitted with the Huerfano County Special Use Permit. Dust mitigation will be discussed through the County permitting process and Huerfano County can request consultation with CDPHE if desired.***

2. Either a revised BMP that can be taken before Director Lepore or a statement accepting the COA as currently written.

Tabula Rasa requests the following language in the COAs.

***The power line that is within 200' of the location will be shut in only while stabilizing the mast during rigging up and rigging down and securing all guide wires. Tabula Rasa will not be required to shut in the power when moving equipment in and out of the location.***

If you need any additional information, please let us know.

Thank you.

Kim

**From:** Deranleau - DNR, Greg [mailto:[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)]  
**Sent:** Monday, May 12, 2014 6:38 PM  
**To:** [krodell@upstreampm.com](mailto:krodell@upstreampm.com)  
**Cc:** [Agross@upstreampm.com](mailto:Agross@upstreampm.com); Larry Coler - DNR; Melissa Housey - DNR

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**Deranleau - DNR, Greg** <[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)>  
To: Matt Lepore - DNR <[matt.lepore@state.co.us](mailto:matt.lepore@state.co.us)>

Fri, May 16, 2014 at 2:03 PM

Matt,

A length correspondence follows below, but I need your acceptance of the changed language because the COA was critical to your initial approval of the Variance Request.

Here is a summary, so you don't have to read the whole e-mail (the critical ones are the early short ones from back in March):

1. Tabula Rasa applied for 2 permits to expand Oil and Gas Locations and twin two existing CO2 wells in Huerfano County in September 2013.
2. A Move-On.org petition was circulated in objection and requesting a public meeting. Public comment was extended, and CDPHE consulted.
3. One location (the Andreatta 3) was determined to need a variance from the new safety setback of 200' to a power line. COGCC visited the Locations.
4. COGCC met with the operator and they requested we move forward with review of Caddell Location but requested time to decide whether they would pursue the Andreatta with a variance or withdraw the application, the Andreatta was put On Hold.
5. Operator decided to move forward with Andreatta with variance request. From 2/12/14 to 3/13/14, COGCC and Operator worked to achieve satisfactory conditions and obtained Director approval for the variance with conditions applied.
6. COGCC prepared to approve Form 2A, but found unresolved issues. COGCC staff reported variance approved (March staff report).
7. On 3/26/14 operator requested change to COA language (below correspondence); COGCC requested operator provide the revised language for proposal to Director. Operator provided unrelated (but required) information, but did not provide alternative language.
8. 5/12/14 Operator requested status update. COGCC notes that we were expecting BMP language from them and some other information.

9. Operator has completed request.

The original COA was written:

As a condition of approval to the variance requested to reduce the safety setback to the overhead utility (Rule 603.a.(1)), 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.

Operator is proposing:

*The power line that is within 200' of the location will be shut in only while stabilizing the mast during rigging up and rigging down and securing all guide wires. Tabula Rasa will not be required to shut in the power when moving equipment in and out of the location.*

I have no issue with this change, and would recommend accepting it.

Thanks!

Greg

[Quoted text hidden]

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**Matt Lepore - DNR** <matt.lepore@state.co.us>  
To: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Fri, May 16, 2014 at 6:23 PM

I concur. Move ahead.

Matthew J. Lepore  
Director



**From:** Deranleau - DNR, Greg [mailto:[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)]  
**Sent:** Friday, May 16, 2014 2:04 PM  
**To:** Matt Lepore - DNR  
**Subject:** Fwd: Tabula Andreatta 3 APD and OGLA

[Quoted text hidden]