

STATE OF
COLORADO

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

MSH Farms Permits

12 messages

Mark E. Brown <MBrown@bayswater.us>
To: "doug.andrews@state.co.us" <doug.andrews@state.co.us>
Cc: Ann Stephens <astephens@petro-fs.com>

Thu, Apr 24, 2014 at 11:51 AM

Doug,

Thanks for talking with me this morning on the power line setback issue at the MSH Farms pad. Attached is the areal picture of the pad showing the two existing wells (red well spots) along with the location of the two wells we'd like to permit (orange well spots) and the existing and planned directional plans.

Again, I'd like to re-iterate our position that this is not a safety issue, as the power line company has given us a waiver and we have already safely drilled two wells from this pad with the same 176' setback from the power line that we are requesting the waiver for now.

The variance request is also based on the following items:

- 1) Potential directional collision problems with existing wellbores (see attached);
- 2) Rig would need to move farther than the 24' to "fit" all equipment around the existing wellheads;
- 3) The surface owner would highly prefer that we keep all wellheads in a line and not increase the surface disturbance of the existing pad.

Thank you for taking another look at this situation and just let me know how we need to proceed.

Mark

Mark E. Brown

Operations Manager



730 17th Street, Suite 610

Denver, CO 80202

Office: [303.893.2503](tel:303.893.2503) x211Fax: [303.893.2508](tel:303.893.2508) - Attn: Mark E. BrownWeb: www.bayswater.usEmail: MBrown@bayswater.us

 MSH Farms.pdf
291K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Thu, Apr 24, 2014 at 12:00 PM

Greg,

This is some follow-up information from Bayswater concerning their Variance Request. When you have some time I'd like to discuss this with you and get your thoughts.

As a refresher, this is the Variance Request where we had asked Bayswater to provide proof the SUA requiring they keep the new wells in line (and less than 200 feet from above ground utilities) with the existing wells and how much bigger the surface disturbance would be if the new wells were moved. Mark Brown told me over the phone before sending the email that their SUA does not require they keep the new wells in line.

[Quoted text hidden]

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us
303-894-2100 Ext. 5180



MSH Farms.pdf
291K

Deranleau - DNR, Greg <greg.deranleau@state.co.us>
To: Doug Andrews <doug.andrews@state.co.us>

Mon, Apr 28, 2014 at 5:52 PM

Catch me on this Tuesday am

[Quoted text hidden]

Mark E. Brown <MBrown@bayswater.us>
To: "doug.andrews@state.co.us" <doug.andrews@state.co.us>
Cc: Ann Stephens <astephens@petro-fs.com>

Tue, Apr 29, 2014 at 3:21 PM

Doug,

Just wondered if you'd had any feedback for me on how we need to proceed with this?

Thanks

Mark

From: Mark E. Brown
Sent: Thursday, April 24, 2014 11:50 AM
To: 'doug.andrews@state.co.us'
Cc: 'Ann Stephens'
Subject: MSH Farms Permits

Doug,

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Mark E. Brown

Operations Manager



730 17th Street, Suite 610

Denver, CO 80202

Office: 303.893.2503 x211

Fax: 303.893.2508 - Attn: Mark E. Brown

Web: www.bayswater.us

Email: MBrown@bayswater.us

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

Tue, Apr 29, 2014 at 3:34 PM

To: "Mark E. Brown" <MBrown@bayswater.us>

Cc: Ann Stephens <astephens@petro-fs.com>

Mark,

I have been trying to meet with Director Lepore to discuss your Variance Request with him.

Based on the additional information you have provided I will recommend he approve this Variance Request. Unfortunately, we had our Commission Hearings the first part of this week and he has not been available to meet with me yet. I will do my best to meet with him this week. I will let you know the outcome of my meeting with him ASAP. Thank you for your continued patience with this process.

[Quoted text hidden]

—

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801

Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

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

Tue, Apr 29, 2014 at 3:34 PM

To: MBrown@bayswater.us

Your message

To: Andrews - DNR, Doug

Subject: RE: MSH Farms Permits

Sent: 4/29/14, 3:21:24 PM MDT

was read on 4/29/14, 3:34:52 PM MDT

Mark E. Brown <MBrown@bayswater.us>

Tue, Apr 29, 2014 at 3:43 PM

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

Cc: Ann Stephens <astephens@petro-fs.com>

Thanks for the info and appreciate the help on this one.

Mark

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Tuesday, April 29, 2014 3:35 PM
To: Mark E. Brown
Cc: Ann Stephens
Subject: Re: MSH Farms Permits

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Mark E. Brown <MBrown@bayswater.us>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Ann Stephens <astephens@petro-fs.com>

Tue, May 6, 2014 at 7:52 AM

Good morning Doug,

Any word back from the Director?

Thx
Mark

Mark E. Brown

On Apr 29, 2014, at 3:36 PM, "Andrews - DNR, Doug" <doug.andrews@state.co.us> wrote:

Mark,
I have been trying to meet with Director Lepore to discuss your Variance Request with him. Based on the additional information you have provided I will recommend he approve this Variance Request. Unfortunately, we had our Commission Hearings the first part of this week and he has not been available to meet with me yet. I will do my best to meet with him this week. I will let you know the outcome of my meeting with him ASAP. Thank you for your continued patience with this process.

On Tue, Apr 29, 2014 at 3:21 PM, Mark E. Brown <MBrown@bayswater.us> wrote:

Doug,

Just wondered if you'd had any feedback for me on how we need to proceed with this?

Thanks

Mark

From: Mark E. Brown
Sent: Thursday, April 24, 2014 11:50 AM
To: 'doug.andrews@state.co.us'
Cc: 'Ann Stephens'
Subject: MSH Farms Permits

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Mark

Mark E. Brown

Operations Manager

<image001.png>

730 17th Street, Suite 610

Denver, CO 80202

Office: 303.893.2503 x211

Fax: 303.893.2508 - Attn: Mark E. Brown

Web: www.bayswater.usEmail: MBrown@bayswater.us

--

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

<image003.jpg>

1120 Lincoln St., Suite 801

Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

2 attachments**BAYSWATER**
EXPLORATION & PRODUCTION, LLC**image001.png**
20K**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources**image003.jpg**
5K**Andrews - DNR, Doug** <doug.andrews@state.co.us>To: "Mark E. Brown" <MBrown@bayswater.us>Cc: Regulatory members <regulatory@petro-fs.com>

Mon, May 19, 2014 at 9:09 AM

Mark,

Over the weekend Director Lepore approved the Variance Request for the MSH Farms 15-P Pad

location. I will work with Ann & Sonia Stephens at PFS to finish up this Form 2A.

Ann & Sonia,

Since this 2A has been sitting for a while, I'd like to update some of the information in it.

- 1) Currently the date planned to commence construction is 4/15/14. Please provide me with a revised date.
- 2) The Noise mitigation BMP only indicates that operations will be subject to maximum noise levels of 55dB, as measured from the nearest Building Unit. Please provide some specifics on the method(s) Bayswater will employ to achieve this.
- 3) The Emissions mitigation BMP only indicates that measure will be undertaken to reduce emissions of salable gas and condensate vapors during cleanout and flowback operations prior to production. Please also provide a Green Completions-Emission Control Systems BMP (Rule 604.c.(2)C & Rule 805) that covers emissions mitigation measures during production.
- 4) Please provide a Leak Detection Plan BMP (Rule 604.c.(2)F).

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

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[Quoted text hidden]



1120 Lincoln St., Suite 801
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

Ann Stephens <astephens@petro-fs.com>

Mon, May 19, 2014 at 9:16 AM

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

Thank you, Doug. I will address your updates tomorrow and get you the needed information.

FYI, Sonia is no longer with PFS.

Many thanks for all your efforts on this.

Respectfully,

Ann Stephens

Regulatory Manager

Petroleum Field Services, LLC

7535 Hilltop Circle

Denver, Colorado 80221

Office: 303-928-7128

Fax: 303-218-5678



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From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]

Sent: Monday, May 19, 2014 9:09 AM

To: Mark E. Brown

Cc: Regulatory members

Subject: Re: MSH Farms Permits

Mark,

[Quoted text hidden]

[Quoted text hidden]

Mark E. Brown <MBrown@bayswater.us>

Mon, May 19, 2014 at 10:20 AM

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

Cc: Regulatory members <regulatory@petro-fs.com>

Thanks for your assistance. Appreciate it!

Mark E. Brown

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COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

image003.jpg
5K

Jennifer Grosshans <jgrosshans@petro-fs.com>

Wed, May 21, 2014 at 9:50 AM

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

Cc: Ann Stephens <astephens@petro-fs.com>, "Mark E. Brown" <MBrown@bayswater.us>

Doug,

Please see my responses in **RED**.

Jennifer Grosshans

Regulatory Technician

Petroleum Field Services LLC

Office: 303-928-7128

Fax: 303-318-5678

7535 Hilltop Circle

Denver, CO 80221



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Ann & Sonia,

Since this 2A has been sitting for a while, I'd like to update some of the information in it.

1) Currently the date planned to commence construction is 4/15/14. Please provide me with a revised date.

7/1/2014

2) The Noise mitigation BMP only indicates that operations will be subject to maximum noise levels of 55dB, as measured from the nearest Building Unit. Please provide some specifics on the method(s) Bayswater will employ to achieve this.

Rule 604.c.(2)A. Noise: All operations will be subject to the maximum permissible noise levels of 55 db, as measured at the nearest Building Unit, and shall be mitigated by either the use of a hay bale or commercial wall sound barrier. Baseline rig noise levels will be obtained prior to moving to location in order to properly plan the mitigation measures necessary for this sight.

3) The Emissions mitigation BMP only indicates that measure will be undertaken to reduce emissions of salable gas and condensate vapors during cleanout and flowback operations prior to production. Please also provide a Green Completions-Emission Control Systems BMP (Rule 604.c.(2)C & Rule 805) that covers emissions mitigation measures during production.

Rule 604.c.(2)C. Green Completions - Emission Control System: Test separators and associated flow lines and sand traps shall be installed on-site to accommodate green completions techniques pursuant to COGCC Rules. In the anticipated absence of a viable gas sales line, the flowback gas shall be thermally oxidized in an emissions control device (ECD), which will be installed and kept in operable condition for least the first 90-days of production pursuant to CDPHE rules. This ECD shall have an adequate capacity for 1.5 times the largest flowback within a 10 mile radius, will be

flanged to route gas to other or permanent oxidizing equipment and shall be provided with the equipment needed to maintain combustions where non-combustible gases are present.

4) Please provide a Leak Detection Plan BMP (Rule 604.c.(2)F).

Rule 604.c.(2)F. Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks. Additionally, monthly documented SPCCP inspections are conducted pursuant to 40 CFR 112.

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