

STATE OF
COLORADO

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

Schneider 19Q-HZ Pad (Form 2A Doc #400562103) - Building Unit less than 500 feet from this location

6 messages

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

Thu, May 1, 2014 at 3:19 PM

To: Julie Webb <julie.webb@pdce.com>

Julie,

While reviewing the Form 2A for this location I see on your Notification Zone Drawing that there is a Building (labelled as B1) approximately 298 feet south across CR 54. When I use Google Maps to view this location and use their Street View option, Building B1 is clearly a mobile home. This makes it not only a Building Unit but now the nearest Building Unit. Which means this location would be within the Exception Zone, not the Buffer Zone as was indicated on the Form 2A when it was submitted. Can you provide any additional information on this mobile home to the south across CR 54? Is it still there? Who owns it? Even if its abandoned and currently unoccupied, if it is still present we consider it to be a Building Unit for the purposes of the 2A.

-

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources1120 Lincoln St., Suite 801
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180

Julie Webb <Julie.Webb@pdce.com>

Fri, May 9, 2014 at 11:05 AM

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

Hi Doug,

I have attached the revised location drawing and notification zone drawing. The building unit is and abandon trailer. The property owner was notified of the location with the per-app letter.

Please let me know if you have any other questions or need anything else.

Thank you,

Julie

 Julie Webb | Regulatory Analyst | PDC Energy | O: 303-831-3933 | Julie.Webb@pdce.com

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

Sent: Thursday, May 01, 2014 3:19 PM

To: Julie Webb

Subject: Schneider 19Q-HZ Pad (Form 2A Doc #400562103) - Building Unit less than 500 feet from this location

[Quoted text hidden]

2 attachments

 **LOCATION DRAWING_SCHNEIDER 19Q-HZ PAD (2014-05-08).pdf**
642K

 **NOTIFICATION ZONE_SCHNEIDER 19Q-HZ PAD (2014-05-08).pdf**
773K

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

Mon, May 12, 2014 at 12:11 PM

To: Julie Webb <Julie.Webb@pdce.com>

Julie,

Thank you for the updated Location Drawing and Notification Zone Drawing and letting me know the property owner where that abandoned trailer home is located has been notified also. Based on this updated information in the Cultural Distance section I will change the distance to the nearest Building and Building Unit to 298 feet and will also change this location from a Buffer Zone location to an Exception Zone location.

I have a few other comments on the Form 2A:

1) In the Facilities section you have indicated there will be two Buried Produced Water Vaults on this location. Please provide a Best Management Practice that covers adverse impacts to shallow groundwater from the use of these produced water vaults.

2) In the Construction section you have indicated the date planned to commence construction is 8/1/15. Please confirm that you do mean August 2015 and not August 2014. Also, the interim reclamation date is December 2015. If these needs revising also, please let me know.

3) While you have included several Best Management Practices (BMPs) concerning the drilling, construction, and operation of this oil and gas location, you have also identified the nearest Building Unit to be 298 feet from the nearest Well or Production Facility. Therefore, please provide **site specific** BMPs addressing the following additional mitigation measures:
Rule 604.c.(3) - Location Specific Requirements within an Exception Zone Setback
Rule 804 - Visual Impact Mitigation
Rule 805 - Odors and Dust

Please respond to this correspondence with the requested items by June 12, 2014. If you have any questions, please feel free to contact me. Thank you.

[Quoted text hidden]

Julie Webb <Julie.Webb@pdce.com>

Wed, May 14, 2014 at 11:26 AM

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

Hi Doug,

I'm sorry I missed the BMP for shallow ground water. Would you please add this to the BMPs?

To prevent adverse impacts to shallow groundwater, buried produced water vault shall be installed above an impermeable synthetic or geosynthetic liner system which shall be tied back into the surface liner.

The construction start date is scheduled for August 2015.

Are Rules 804 and 805 required for every single location, not just exception zone locations? I couldn't find any language that suggested it was only for exception zones. I'm not arguing against providing the "site-specific" language, but just wondering if it is necessary to put on the permits, seeing that it is the standard rules or more so for the public to see that these issues are being addressed. My field team will ask why, so I'm just trying to stay ahead of any potential questions they might throw at me.

Thanks for your help.

Julie

 Julie Webb | Regulatory Analyst | PDC Energy | O: 303-831-3933 | Julie.Webb@pdce.com

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

Sent: Monday, May 12, 2014 12:11 PM

To: Julie Webb

Subject: Re: Schneider 19Q-HZ Pad (Form 2A Doc #400562103) - Building Unit less than 500 feet from this location

[Quoted text hidden]

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

Wed, May 14, 2014 at 12:02 PM

To: Julie Webb <Julie.Webb@pdce.com>

Rule 802, 803, 804, & 805, while not specific to a Buffer Zone, Exception Zone or Urban Mitigation Area designated setback location, are required for all oil and gas locations. However, when a proposed oil and gas location is within a designated setback location, we want operators to also address site specific mitigation of the impacts outlined in these four Rules on the Form 2A in addition to the required specific mitigation measures in Rule 604.c. These four Rules in the 800 Series cover issues (Noise Abatement, Lighting, Visual Impact, & Odors and Dust) that are frequently of concern to nearby Building Unit owners. So yes, when your location is within a

designated setback we want operators to be very upfront with both the COGCC and the public who may be looking at the Form 2A, that these issues are being addressed.

[Quoted text hidden]

Julie Webb <Julie.Webb@pdce.com>

Wed, May 28, 2014 at 10:26 AM

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

Doug,

Listed below are the three additional BMPs requested for the location. Please let me know if you need anything else.

804. Visual Impact: Production facilities, regardless of construction date, which are observable from any public highway will be painted with uniform, non-contrasting, non-reflective color tones (similar to the Munsell Soil Color Coding System), and with colors matched to but slightly darker than the surrounding landscape.

805.b(1)-(c) Odors and Dust: Oil and gas facilities and equipment will operate in a manner that odors and dust do not constitute a nuisance or hazard to public welfare. Odors: Oil and gas operations will be in compliance with the Department of Public Health and Environment, Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. Dust; PDC will employ practices for control of fugitive dust caused by operations include but not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic.

604c.(3).B. Berm Construction: Containment berms will be constructed using steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation. Secondary containment will be constructed with a geosynthetic liner that contains all tanks and flowlines at this location and will be connected to the steel ring to prevent leakage. Operator will implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the down gradient water sources located from the nearest well head.

Thank you,

Julie

 Julie Webb | Regulatory Analyst | PDC Energy | O: 303-831-3933 | Julie.Webb@pdce.com

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

Sent: Monday, May 12, 2014 12:11 PM

To: Julie Webb

Subject: Re: Schneider 19Q-HZ Pad (Form 2A Doc #400562103) - Building Unit less than 500 feet from this location

[Quoted text hidden]