

STATE OF
COLORADO

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

COGCC Form 2A review of Extraction O&G's Varra 5-1 Pad - Doc #400620296

2 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Regulatory members <regulatory@petro-fs.com>
Cc: Sarah Freeman - DNR <sarah.freeman@state.co.us>

Wed, Jun 18, 2014 at 11:32 AM

Jennifer,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) Your Facility Layout Drawing depicts six Vapor Recovery Units (VRUs) and two Vapor Recovery Towers (VRTs); however, they are not included in the Facilities list. Please confirm if they will be on this proposed oil and gas location and I will add them if necessary.
- 2) In the Facilities section you have listed six gas compressors; however, these do not appear on your Facility Layout Drawing. Please confirm if they will be on this proposed oil and gas location and if so send me a revised Facility Layout Drawing depicting where they will be placed.
- 3) During my review it appears that the operational disturbance area as depicted on your Location Drawing will overlap onto the 47-Olney fine sandy loam, 1 to 3 percent slopes NRCS Map Unit. Specifically the area where the proposed production facilities will be located. Please provide me with the NRCS Map Unit Description of the soil unit and I will add it to the Form 2A.
- 4) In the Water Resources section you have indicated the nearest water well is Permit #43296 located 2,312 feet south of the proposed oil and gas location. Although this water well does not list a static water level, because it is the nearest well that has been constructed and still exists, it should be used to determine the distance to the nearest water well. Therefore, I will change that distance from 3,632 feet to 2,312 feet.
- 5) In the Cultural Distance section you have indicated the distance to the nearest property line is 123 feet as measured from the proposed Varra #6 well. This is not in compliance with COGCC Rule 603.a.(2) and requires an Exception Location Request letter and an Exception Location waiver signed by the property owner for this property line setback. If this has not been included with the Form 2 APDs, please send them to Sarah Freeman at the COGCC.

Please respond to this correspondence with the requested items by June 18, 2014. If you have questions, please contact me. Thank you.

-

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

Jennifer Grosshans <jgrosshans@petro-fs.com>

Wed, Jun 18, 2014 at 11:50 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Regulatory members <regulatory@petro-fs.com>

Cc: Sarah Freeman - DNR <sarah.freeman@state.co.us>

Please see my responses in **RED** below.

Jennifer Grosshans

Regulatory Technician

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

Sent: Wednesday, June 18, 2014 11:32 AM

To: Regulatory members

Cc: Sarah Freeman - DNR

Subject: COGCC Form 2A review of Extraction O&G's Varra 5-1 Pad - Doc #400620296

Jennifer,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Your Facility Layout Drawing depicts six Vapor Recovery Units (VRUs) and two Vapor Recovery Towers (VRTs); however, they are not included in the Facilities list. Please confirm if they will be on this proposed oil and gas location and I will add them if necessary. **That is correct. Thank you.**

2) In the Facilities section you have listed six gas compressors; however, these do not appear on your Facility Layout Drawing. Please confirm if they will be on this proposed oil and gas location and if so send me a revised Facility Layout Drawing depicting where they will be placed. **They will not be on the proposed oil and gas location.**

3) During my review it appears that the operational disturbance area as depicted on your Location Drawing will overlap onto the 47-Olney fine sandy loam, 1 to 3 percent slopes NRCS Map Unit. Specifically the area where the proposed production facilities will be located. Please provide me with the NRCS Map Unit Description of the soil unit and I will add it to the Form 2A. **Please find attached.**

4) In the Water Resources section you have indicated the nearest water well is Permit #43296 located 2,312 feet south of the proposed oil and gas location. Although this water well does not list a static water level, because it is the nearest well that has been constructed and still exists, it should be used to determine the distance to the nearest water well. Therefore, I will change that distance from 3,632 feet to 2,312 feet. **This is fine, thank you.**

5) In the Cultural Distance section you have indicated the distance to the nearest property line is 123 feet as measured from the proposed Varra #6 well. This is not in compliance with COGCC Rule 603.a.(2) and requires an Exception Location Request letter and an Exception Location waiver signed by the property owner for this property line setback. If this has not been included with the Form 2 APDs, please send them to Sarah Freeman at the COGCC.

On the Form 2s we put the following language to cover this issue and attached the SUA:

Letter to the Director for COGCC Rule 318A.a. Exception Location Request is not required per the Surface Use Agreement (SUA). In the SUA, Section 9, Waiver of

30-Day Notice, states that "Owner agrees to allow Operator to locate the Wells anywhere on the surface of the property." Please find a copy of the SUA attached as Surface Agrmt/Surety.

Please respond to this correspondence with the requested items by June 18, 2014. If you have questions, please contact me. Thank you.

--

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



47_SOIL_Olney_fine_sandy_loam_1_to_3_percent_slopes--Weld_County_Colorado_Southern_Part.

pdf

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