



STATE OF
COLORADO

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

COGCC Form 2A review of Cirque Resources' Railay 28-3-1CH location - Doc #400623703

2 messages

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

Mon, Jun 30, 2014 at 1:56 PM

To: david@windmillenergy.net, Sarah Freeman - DNR <sarah.freeman@state.co.us>

David,

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

1) In the Facilities section, your pipeline description only indicates that the operator intends to flare until gas pipeline connection is ready. This is not an adequate pipeline description. Please provide a description of all pipelines on the location that flow from the well to the separator to the tanks that includes at a minimum the number, size, and material of each pipeline, buried or above ground, pressurized or not.

2) In the Facilities section you have indicated that one Temporary Large Volume Above Ground Tank will be used on this proposed oil and gas location. The COGCC has recently enacted a policy on the permissible use of these large volume tanks. This policy can be found at: http://cogcc.state.co.us/announcements/Hot_Topics/ModularLargeVolumeTanks/ModularLargeVolumeTanks.html

The following information regarding a proposed large volume tank is required to be included on the Form 2A: the manufacturer or vendor of the tank, number and size/volume of the tank(s), anticipated timeframe they will be onsite, a Location Drawing indicating where the large volume tanks will be located with respect to other facility equipment, property boundaries, and the Operator's certification that the large volume tanks will be designed and implemented consistent with this policy.

3) In the Drilling Waste Management Program section you have indicated that drilling fluids will be disposed of offsite via land application. However, you have not indicated if a land application plan has been submitted to the COGCC for our review and I could not find an approved land application plan in our database for Cirque Resources. Land application plans must be submitted to the COGCC for our approval prior to disposal of drilling wastes.

4) In the Water Resources section, you have indicated the nearest downgradient surface water feature is 1,000 feet from this proposed oil and gas location. During my review I did not identify any downgradient surface water features 1,000 feet from the proposed oil and gas location. The nearest downgradient surface water feature appears to be Owl Creek approximately 3,300 feet southeast of the proposed oil and gas location. Therefore, I would like to change this distance on the Form 2A.

Please respond to this correspondence with the requested information by July 30, 2014. If you have any questions, please contact me. Thank you.

—

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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David Platt <david@windmillenergy.net>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Jul 1, 2014 at 5:38 PM

Doug,

Thanks for your comments. Please find attached Cirque's certification and a drawing of the location of the MLVT. In response:

- 1) Pipelines: There will be a buried 3" steel line from the wellhead to the separator and the heater-treater. Then there will be two (2) buried 3" steel lines to the tanks. There will be a 4" surface line from the tanks to the combustor and a 2" buried line from the separator to the flare. All buried lines will be pressurized. In addition, the facilities should include 1 gas motor and a VOC combustor not a vapor recovery unit.
- 2) Facilities: The above ground tank will come from Rockwater. It will be a 40,000 bbl tank onsite for approximately 3 weeks during the completion.
- 3) Drilling Fluids: Please change the disposal method of the drilling fluids to commercial disposal at CSI's facility.
- 4) Surface Water: Please change the distance to the nearest downgradient surface water feature to be Owl Creek approximately 3,300 feet southeast of the proposed oil and gas location.

Please let me know if you any questions. Thank you again.

David Platt

Windmill Energy

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303-573-4436

303-550-5120 (c)

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

Sent: Monday, June 30, 2014 1:56 PM

To: david@windmillenergy.net; Sarah Freeman - DNR

Subject: COGCC Form 2A review of Cirque Resources' Railay 28-3-1CH location - Doc #400623703

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2 attachments



Railay 28-3-1CH Rig Layout (1).pdf

32K



Tank certification signed.pdf

121K