



STATE OF
COLORADO

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

BMP answers for your COGCC Form 4 Sundry review for Mineral Resources' Greeley Directional - Doc #400691841

1 message

Sonia Spencer <sonia.spencer@iptenergyservices.com>

Tue, Sep 23, 2014 at 3:32 PM

To: "Doug Andrews (doug.andrews@state.co.us)" <doug.andrews@state.co.us>

Cc: Derek Petrie <derek.petrie@iptenergyservices.com>, "Dustin Dyk (DDyk@ExtractionOG.com)" <DDyk@extractionog.com>

Doug,

I have reviewed the answers with Extraction and our answers are in Red for you below. Thank you for your guidance.

Respectfully,

Sonia Spencer

From: Derek Petrie

Sent: Tuesday, September 23, 2014 8:49 AM

To: Sonia Spencer; Jonathan Runge

Subject: FW: COGCC Form 4 Sundry review for Mineral Resources' Greeley Directional - Doc #400691841

Thanks,

Derek Petrie

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From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Tuesday, September 23, 2014 8:45 AM
To: Derek Petrie; John Noto - DNR; Penny Garrison - DNR
Subject: COGCC Form 4 Sundry review for Mineral Resources' Greeley Directional - Doc #400691841

Derek,

Some issues with the Form 4 Sundry.

1) Per the COGCC Policy on the use of MLVTs, the Operator shall provide a certification that the MLVTs will be designed and implemented consistent with this policy. There is no BMP or attached statement from Mineral Resources indicating the MLVTs will be designed and implemented consistent with the Policy. The attachment from Dynamic Engineering Consultants does not suffice. This certification must come from the Operator, as we hold the Operator responsible for compliance with our MLVT Policy not vendors. **Mineral Resources is responsible for the design and implementation of MLVTs on the Greeley Directional location. Compliance with MLVT policy dated 06/13/2013 will be sole responsibility of Mineral Resources.**

2) The following BMP is inadequate: "A noise impact modeling report was prepared by Behrens and Associates, Inc. Refer to the report for specifics pertaining to anticipated noise from the proposed use." This BMP should include the specific findings of the modeling report. Do not provide us with the report. ***The Noise Study conducted by consultants Behrens and Associates, Inc. for Greeley Directional is in compliance with COGCC Section 802 "Noise Abatement". The site is bordered by industrial zoned property and residential to the northwest and west. No additional mitigation is required for this site of using sound mufflers or sound walls. The Unmitigated noise impact models representing drilling and fracing operations at the site were constructed and the results compared to the COGCC Standard.**

3) There are Fugitive Dust Control Notes on the Erosion and Sediment Control Plan from the Greeley USR. They speak to dust control related to unpaved roads and I would like to add them to the list of BMPs. Specifically:

1A - Watering shall be completed as needed to control dust on unpaved roads. **Yes please add this.**

1B - Speed limits to prevent dust on unpaved roads. **Yes please add this.**

--

Doug Andrews

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