

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

**COGCC Form 2A review of NGL Water Solutions' NGL C10 location - Doc #400721734**

5 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>  
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>

Mon, Nov 24, 2014 at 1:14 PM

Paul,

I have completed my review of the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Because you have indicated Current and Future Land Use at this proposed oil and gas location is Cropland, Reference Area Pictures and Map attachments are not required. Therefore, I would like to remove them from this Form 2A.

2) A review of your letter certifying compliance with COGCC Rule 305.a.(2) does not quite meet the requirements in Rule 303.b.(3).J.iii. That Rule requires evidence that Building Unit owners within the Buffer Zone **received** their Rule 305.a.(2) pre-application notice. Your certification letter only indicates that NGL Water Solutions DJ, LLC sent the Rule 305.a.(2) pre-application notices. Please revise this certification to also indicate all Building Unit owners within the Buffer Zone **received** their Rule 305.a.(2) pre-application notice and that the evidence of receipt is being kept on file with NGL Water Solutions.

3) A review of your Access Road leads to many questions. It depicts a proposed Access Road that will proceed due north from County Road 74, cross the existing Access Road for the PDC Booth 34-35 well, and enter NGL's proposed location near the western corner. Not only does this depict an Access Road that does not use the existing PDC Access Road to minimize surface disturbance, it directly contradicts the access as shown on your Facility Layout Drawing. The Facility Layout Drawing appears to depict a more likely access to this proposed location that would be needed to unload fluids for disposal in the injection well. Please review these two attachments and provide a revised Access Road Map.

4) You have provided a BMP that indicates this will be a two well pad even though the Facilities list and all Attachments indicate there will be only one well on this proposed oil and gas location. Based on our telephone conversation this morning, please confirm it is your intention to only permit this location with one well at this time. If additional wells will be added to this location in the future, an Amended Form 2A will need to be submitted.

Please respond to this correspondence by December 24, 2014. If you have any questions, please contact me. Thank you.

**Doug Andrews**

Oil &amp; Gas Location Assessment Specialist - Northeast Area



**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

**Paul Gottlob** <[paul.gottlob@iptenergyservices.com](mailto:paul.gottlob@iptenergyservices.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Mon, Nov 24, 2014 at 2:00 PM

Doug,

I have replied to each below in red.

Please let me know if you require anything else.

Thanks! Hope you have a great Holiday!

Paul

**From:** Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]  
**Sent:** Monday, November 24, 2014 1:15 PM  
**To:** Paul Gottlob  
**Subject:** COGCC Form 2A review of NGL Water Solutions' NGL C10 location - Doc #400721734

Paul,

I have completed my review of the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Because you have indicated Current and Future Land Use at this proposed oil and gas location is Cropland, Reference Area Pictures and Map attachments are not required. Therefore, I would like to remove them from this Form 2A. **Agreed.**

2) A review of your letter certifying compliance with COGCC Rule 305.a.(2) does not quite meet the requirements in Rule 303.b.(3).J.iii. That Rule requires evidence that Building Unit owners within the Buffer Zone **received** their Rule 305.a.(2) pre-application notice. Your certification letter only indicates that NGL Water Solutions DJ, LLC sent the Rule 305.a.(2) pre-application notices. Please revise this certification to also indicate all Building Unit owners within the Buffer Zone **received** their Rule 305.a.(2) pre-application notice and that the evidence of receipt is being kept on file with NGL Water Solutions. **I have updated the 305.a.(2) letter to meet the requirements you indicated and it is attached and I do Certify it is valid.**

3) A review of your Access Road leads to many questions. It depicts a proposed Access Road that will proceed due north from County Road 74, cross the existing Access Road for the PDC Booth 34-35 well, and enter NGL's proposed location near the western corner. Not only does

this depict an Access Road that does not use the existing PDC Access Road to minimize surface disturbance, it directly contradicts the access as shown on your Facility Layout Drawing. The Facility Layout Drawing appears to depict a more likely access to this proposed location that would be needed to unload fluids for disposal in the injection well. Please review these two attachments and provide a revised Access Road Map. **The current PDC Access Road is really not a good access for bringing in a Rig as it has several sharp turns to go around PDC's current Battery to get to the trail along the west side of the irrigation circle. The Access Road on the Proposed Scaled Facility Drawing is for the Permanent Facility (which will be constructed simultaneously with the Drilling operations and NLG did not want Drilling Operations to interfere with the construction operations of the facility) That left the proposed access road - to separate drilling ops traffic.**

4) You have provided a BMP that indicates this will be a two well pad even though the Facilities list and all Attachments indicate there will be only one well on this proposed oil and gas location. Based on our telephone conversation this morning, please confirm it is your intention to only permit this location with one well at this time. If additional wells will be added to this location in the future, an Amended Form 2A will need to be submitted.

**It is my intention to permit just this one well at this time, as we discussed. Please correct to one well.**

Please respond to this correspondence by December 24, 2014. If you have any 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](mailto:doug.andrews@state.co.us)

303-894-2100 Ext. 5180

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**NGL C10 - 305.a. 303.b.(3) J.iii Certification to the Director.pdf**

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**Andrews - DNR, Doug** <doug.andrews@state.co.us>  
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>

Mon, Nov 24, 2014 at 2:15 PM

Paul,

Given the additional clarification you have provided about access to this proposed oil and gas location, please revise the Access Road Map to show both access roads. Be sure to indicate that the western one is for drilling ops traffic and the one to the east will be the for the permanent facility. Additionally, I'd like to add a Condition of Approval that indicates the western Access Road will be reclaimed upon completion of drilling operations.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



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[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
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**Paul Gottlob** <paul.gottlob@iptenergyservices.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Nov 24, 2014 at 2:46 PM

Doug,

Agreed to your below COA. I will get the Access Road Diagram updated and over to you ASAP.

Paul

**PAUL GOTTLOB**

Regulatory & Engineering Technician

P: [720.420.5747](tel:720.420.5747)

C: [720.394.6961](tel:720.394.6961)



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

**Sent:** Monday, November 24, 2014 2:16 PM

**To:** Paul Gottlob

**Subject:** Re: COGCC Form 2A review of NGL Water Solutions' NGL C10 location - Doc #400721734

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**Paul Gottlob** <[paul.gottlob@iptenergyservices.com](mailto:paul.gottlob@iptenergyservices.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Mon, Nov 24, 2014 at 4:40 PM

Doug,

Attached is the updated Access Road you requested.

Thanks!

Paul

**PAUL GOTTLOB**

Regulatory & Engineering Technician

P: [720.420.5747](tel:720.420.5747)

C: [720.394.6961](tel:720.394.6961)



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

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