

## Dave Kubeczko - DNR

---

**From:** Dave Kubeczko - DNR  
**Sent:** Monday, November 24, 2014 8:55 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Catamount Energy Partners LLC, Lynch 34-6-18 #1 Pad, SWNW Sec 18 T34N R6W, La Plata County, Form 2A #400607994 Review  
**Attachments:** Waste Management Plan.pdf; Rule 306.e Certification Letter.pdf; OGLA Notice - Lynch 34-6-18 - Lynch, James.pdf; Lynch 34-6-18U #1 500 RAD.pdf; Rule 604.c(2) BMPs.pdf; Facility Layout Drawing.pdf  
**Categories:** Operator Correspondence

Scan No 2107160      CORRESPONDENCE      2A#400607994

---

**From:** Nolan Redmond [mailto:[nredmond@catamountep.com](mailto:nredmond@catamountep.com)]  
**Sent:** Monday, October 20, 2014 7:26 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** FW: Catamount Energy Partners LLC, Lynch 34-6-18 #1 Pad, SWNW Sec 18 T34N R6W, La Plata County, Form 2A #400607994 Review

Dave,

We have reviewed the COAs for the Lynch pad. Here are our responses and please let me know if you need anything else.

**Rule 303.b.(3).J.i and ii:**

Please find scaled a facility layout drawing and a waste management plan attached.

**Rule 305.a.(2):**

Please find a copy of the notice of comment period to the surface owner per Rule 305.c attached.

**Rule 306.e.(5):**

Please find a letter stating that Catamount complied with the meeting requirements of Rule 306.e attached.

**Rule 303.b.(3).C.:**

Facilities are depicted on the scaled facility layout drawing and will include the following:

2 – C228 Pumpjacks 28'2"L x 8'W x 23'11"H

2 – Separators 15'6"L x 6' W x 9'H

2 – Arrow C101 Gas engines w/ 20 hp each (derated for elevation)

2 – 400 bbl Produced Water Storage Tanks

Pipelines will consist of the following;

Onsite flowlines: 1-4" gas & water steel piping rated from 150 to ANSI 600 pressure rating from wellheads through facilities to the pipelines.

Offsite gas pipeline – 6" gas pipeline, (steel, 6.625" OD, 0.25 to 0.28 WT, X-52), rated to ANSI 300 pressure rating (750 psig MAWP), approximately 3400' to tie-in from separators.

Onsite water pipeline – 3" poly SDR-11 w/a 160 psi pressure rating, from separator to produced water storage tanks.

Subject to availability, and final design engineering.

**Rule 303.b.(3).D.:**

Please find a 500' improvement drawing attached.

**Rule 604.c.(2).E.i.:**

Facilities will be placed on the southern portion of the pad to be as far from building units as possible, while still meeting setback requirements.

**Rule 604.c.(2). A. thru W.:**

Please find a list of BMPs attached.

COA 85: Instead of sloping the well pad to the west, Catamount would like to propose the well pad be sloped to the east towards the collection system.

Catamount concurs with all other COAs not specifically herein addressed.

Thanks,

Nolan Redmond  
Catamount Energy Partners  
1801 Broadway  
Suite 1000  
Denver CO 80202  
[nredmond@catamountep.com](mailto:nredmond@catamountep.com)  
720-484-2347 Office  
303-909-3587 Cell



---

**From:** Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]

**Sent:** Tuesday, September 30, 2014 3:13 PM

**To:** Nolan Redmond

**Subject:** Catamount Energy Partners LLC, Lynch 34-6-18 #1 Pad, SWNW Sec 18 T34N R6W, La Plata County, Form 2A #400607994 Review

Nolan,

I have been reviewing the Lynch 34-6-18 #1 Pad **Form 2A** (#400607994). COGCC requests that Catamount Energy Partners LLC (Catamount) needs to meet the requirements of **Rule 303.b.(3).J.i. and ii., Rule 604.c.(2).E.i.,** and mitigation measures outlined in **Rule 604.c.(2). A. thru W.** COGCC would like **additional/revised** attachments (**Facility Layout Drawing, Revised Location Drawing, Waste Management Plan**) as outlined below; and more detailed information about onsite flowlines and offsite pipelines, including size and type of material for water, condensate, and gas flowlines between the wellheads, separators, and tanks, as well as the gas and water (if applicable) pipelines leaving the location, including estimated length to the tie in point.

**Rule 303.b.(3).J.i and ii:**

**303. REQUIREMENTS FOR FORM 2, APPLICATION FOR PERMIT-TO-DRILL, DEEPEN, RE-ENTER, OR RECOMPLETE, AND OPERATE; FORM 2A, OIL AND GAS LOCATION ASSESSMENT.**

**b. FORM 2A, OIL AND GAS LOCATION ASSESSMENT.**

(3) **Information Requirements.** The Form 2A requires the attachment of the following information. Where the information required under this section has been included in a federal Surface Use Plan of Operations meeting the requirements of Onshore Oil and Gas Order Number 1 (72 Fed. Reg. 10308 (March 7, 2007)), or for a federal

Right of Way, Form 299, then the operator may attach the completed pertinent information and identify on the Form 2A where the information required under this section may be found therein.

J. If the proposed Oil and Gas Location is within one thousand (1,000) feet of a Building Unit

- i. A scaled facility layout drawing depicting the location of all existing and proposed new Oil and Gas Facilities listed on the Form 2A;
- ii. A Waste Management Plan describing how the Operator intends to satisfy the general requirements of Rule 907.a.; and
- iii. Evidence that Building Unit owners within the Buffer Zone received the pre-application notice required by Rule 305.a.(2).

Catamount needs to provide COGCC with a scaled facility layout Drawing showing the location of all existing and proposed new Oil and Gas Facilities listed on the Form 2A, including onsite fencing around the pumping jacks and separators, the tertiary containment trench/catchment basin along the eastern and northern pad boundary both during drilling and completion, and the lined tertiary containment trench/catchment basin after the pad has been scaled back during interim reclamation, and any proposed offsite pipelines.

Catamount also needs to submit a Waste Management Plan describing how the Operator intends to satisfy the general requirements of Rule 907.a.

#### Rule 305.a.(2):

##### **305. FORM 2 AND 2A APPLICATION PROCEDURES**

a. **Pre-application notifications.** For Oil and Gas Locations proposed within an Urban Mitigation Area or within the Buffer Zone Setback, an Operator shall provide a "Notice of Intent to Conduct Oil and Gas Operations" to the persons specified herein not less than thirty (30) days prior to submitting a Form 2A Oil and Gas Location Assessment to the Director.

(2) Exception Zone and Buffer Zone Setback Notice to the Surface Owner and Building Unit Owners. For Oil and Gas Locations proposed within the Exception Zone or Buffer Zone Setback, Operators shall notify the Surface Owner and the owners of all Building Units that a permit to conduct Oil and Gas Operations is being sought. The Operator may rely on the county assessor tax records to identify the persons entitled to receive the Notice. Notice shall include the following:

- A. The Operator's contact information;
- B. The location and a general description of the proposed Well or Oil and Gas Facilities;
- C. The anticipated date operations will commence (by calendar quarter and year);
- D. The Local Governmental Designee's (LGD) contact information;
- E. Notice that the Building Unit owner may request a meeting to discuss the proposed operations by contacting the LGD or the Operator; and
- F. A "Notice of Comment Period" will be sent pursuant to Rule 305.c. when the public comment period commences.

#### Rule 306.e.(5):

**306. CONSULTATION AND MEETING PROCEDURES.** Following the notifications provided for in Rule 305.c, an Operator shall comply with the following consultation and meeting procedures:

##### **e. Meetings with Building Unit Owners Within a Buffer Zone Setback.**

(1) **Meetings with Building Unit Owners.** An Operator shall be available to meet with Building Unit owners who received an OGLA Notice or a Buffer Zone Notice pursuant to Rule 305.c. and requested a meeting regarding the proposed Oil and Gas Location. Operators shall also be available to meet with such Building Unit owners if requested to do so by the Local Governmental Designee and such meetings shall comply with Rule 306.b.(3). Such informational meetings may be held on an individual basis, in small groups, or in larger community meetings.

(2) **Information provided by operator.** When meeting with Building Unit owners or their appointed agent(s) pursuant to subsection (1), above, the Operator shall provide the following information: the date construction is anticipated to begin; the anticipated duration of pad construction, drilling and completion activities; the types of equipment anticipated to be present on the Location; and the operator's interim and final reclamation obligation. In addition, the Operator shall present a description and diagram of the proposed Oil and Gas

Location that includes the dimensions of the Location and the anticipated layout of production or injection facilities, pipelines, roads and any other areas to be used for oil and gas operations. The Operator and Building Unit owners shall be encouraged to discuss potential concerns associated with Oil and Gas Operations, such as security, noise, light, odors, dust, and traffic, and shall provide information on proposed or recommended Best Management Practices or mitigation measures to eliminate, minimize or mitigate those issues.

(3) **Waiver.** The Building Unit owner or agent may waive, permanently or otherwise, the foregoing meeting requirements. Any such waiver shall be in writing, signed by the owner or agent, and shall be submitted by the Building Unit owner or agent to the operator and the Director.

(4) **Mitigation Measures.** Operators will consider all legitimate concerns related to public health, safety, and welfare raised during informational meetings or in written comments and, in consultation with the Director and Local Governmental Designee if the LGD so requests, will add relevant and appropriate Best Management Practices or mitigation measures as Conditions of Approval into the Form 2A and any associated Form 2s.

(5) **Operator Certification.** The Director shall not approve a Form 2A, Oil and Gas Location Assessment, until the operator certifies it has complied with the meeting requirements of this Rule 306.e.

**Catamount needs to provide COGCC with a letter certifying that they have complied with the meeting requirements of Rule 306.e. above. I have attached an example of this type of letter.**

**Rule 303.b.(3).C.:** A list of major equipment components to be used in conjunction with drilling and operating the well(s), including all tanks, pits, flares, combustion equipment, separators, and other ancillary equipment and a description of any pipelines for oil, gas, or water.

**Catamount needs to provide more detailed information about onsite flowlines and offsite pipelines, including size and type of material for water, condensate, and gas flowlines between the wellheads, separators, and tanks, as well as the gas and water (if applicable) pipelines leaving the location, including estimated length to the tie in point.**

**Rule 303.b.(3).D.:** A scaled drawing, or scaled aerial photograph showing the approximate outline of the Oil and Gas Location and the Well or reference point use for measuring distances. The drawing shall include all visible improvements within five hundred (500) feet of the proposed Oil and Gas Location, with a horizontal distance and approximate bearing from Oil and Gas Location. Visible improvements shall include, but not be limited to, all Building Units, publicly maintained roads and trails, major above-ground utility lines, railroads, pipelines, mines, oil wells, gas wells, injection wells, water wells known to the operator and those registered with the Colorado State Engineer, known springs, plugged wells, known sewers with manholes, standing bodies of water, and natural channels including permanent canals and ditches through which water may flow. A description of surface uses within the five hundred (500) foot radius of a proposed Oil and Gas Location, if any, shall be attached to the scaled drawing. If there are no visible improvements within five hundred (500) feet of a proposed Oil and Gas Location, it shall be so noted on the Form 2A.

**The Location Drawing should show the 500-foot buffer (an actual line on the drawing) measured from the edge of disturbance (not the center of the well pad) and any improvements (listed in the rule: pipelines, fences, stormwater control structures, etc.) within 500-feet. This drawing should fill the entire page to allow for details to be seen.**

**Rule 604.c.(2).E.i.:**

#### **604. SETBACK AND MITIGATION MEASURES FOR OIL AND GAS FACILITIES, DRILLING, AND WELL SERVICING OPERATIONS**

c. **Mitigation Measures.** The following requirements apply to an Oil and Gas Location within a Designated Setback Location and such requirements shall be incorporated into the Form 2A or associated Form 2 as Conditions of Approval.

(2) **Location Specific Requirements – Designated Setback Locations.** Subject to Rule 502.b., the following mitigation measures shall apply to any Well or Production Facility proposed to be located within a Designated Setback Location for which a Form 2 Application for Permit to Drill or Form 2A Oil and Gas Location Assessment is submitted on or after August 1, 2013:

##### **E. Multiwell Pads.**

- i. Where technologically feasible and economically practicable, operators shall consolidate wells to create multi-well pads, including shared locations with other operators. **Multi-well production facilities shall be located as far as possible from Building Units.**
- ii. The pad shall be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping.
- iii. Pads shall have all weather access roads to allow for operator and emergency response.

**Catamount needs to provide a statement that clarifies the placement of the production facilities on the southern portion of the pad instead of the northern portion, which would be slightly further from Building Units.**

COGCC would like to attach the following conditions of approval (COAs) based on the information and data Catamount has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, start of hydraulic stimulation operations, start of flowback operations, and pipeline testing using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**In addition, this location has been designated a “sensitive area” due to proximity to downgradient surface water (151’), proximity to a water well (355’), and potential for shallow groundwater (22’ below ground surface).**

**Construction:** The following conditions of approval (COAs) will apply:

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 76** - Strategically apply fugitive dust control measures, including enforcing established speed limits on the adjacent county road 523 and private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) to contain any spilled or released material around permanent crude oil, condensate, and produced water storage tanks.

**Drilling/Completions:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of any cuttings in a cuttings trench or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

**COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface pipelines (poly or steel) or buried (poly or steel) pipelines are used during operations at the well pad location or nearby well pads:

**COA 45** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network.

**COA 55** - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance.

Operator shall also adhere to the BMPs listed on the Operator BMP/COA Tab as well as to the following rule:

**Rule 604.c.(2). A. thru W.:**

#### **604. SETBACK AND MITIGATION MEASURES FOR OIL AND GAS FACILITIES, DRILLING, AND WELL SERVICING OPERATIONS**

c. **Mitigation Measures.** The following requirements apply to an Oil and Gas Location within a Designated Setback Location and such requirements shall be incorporated into the Form 2A or associated Form 2 as Conditions of Approval.

(2) **Location Specific Requirements - Designated Setback Locations.** Subject to Rule 502.b., the following mitigation measures shall apply to any Well or Production Facility proposed to be located within a Designated Setback Location for which a Form 2 Application for Permit to Drill or Form 2A Oil and Gas Location Assessment is submitted on or after August 1, 2013:

**Catamount needs to provide a list of BMPs to address the mitigation measures required in Rule 604.c.(2). A. thru W.**

Based on the COGCC/Catamount/La Plata County/La Plata Open Space Conservancy/Surface Owner Onsite on 09-08-14, as well as the CPW Consultation Letter (dated 09-26-14) which listed a number of wildlife Best Management Practices (BMPs) recommended for this location (and responded to by Catamount on 09-26-14), COGCC will place the following site-specific COAs and wildlife BMPs on this Form 2A Permit:

**Planning:** The following conditions of approval (COAs) will apply:

**COA 32** - Surface water samples (one upstream and one downstream from the well pad location) from the unnamed stream located approximately 366 feet to the east of the location (if water is present), shall be collected prior to pad construction, during drilling/completions, and repeated one (1), three (3) and six (6) years thereafter to evaluate potential impacts from well pad operations. If no significant changes from the baseline have been identified after the third test (i.e. the six-year test), no further testing shall be required. At a minimum, the surface water samples will be analyzed for pH, specific conductance, total dissolved solids (TDS), dissolved gases (methane, ethane, propane), alkalinity (total bicarbonate and carbonate as CaCO<sub>3</sub>), major anions (bromide, chloride, fluoride, sulfate, nitrate and nitrite as N, phosphorus), major cations (calcium, iron, magnesium, manganese, potassium, sodium), other elements (barium, boron, selenium and strontium), presence of bacteria (iron related, sulfate reducing, slime forming), total petroleum hydrocarbons (TPH) and BTEX compounds (benzene, toluene, ethylbenzene and xylenes). Field observations such as odor, water color, sediment, bubbles, and effervescence shall also be documented. The location of the sampled Water Sources shall be surveyed in accordance with Rule 215.

**Construction:** The following conditions of approval (COAs) will apply:

**COA 82** - Operator will fence all equipment with moving parts (pumping jacks and separators). Fencing will be designed and constructed to keep wildlife out of the area without injury.

**COA 83** - Operator will place sound mitigation around the pump jacks and production equipment (separators if needed) in the direction (and preferably completely around the equipment) of nearby building units (and preferably completely around the equipment) in order to mitigate nuisance noise levels to comply with the lowest (Residential/Agricultural/Rural) requirements in **Rule 802. Noise Abatement**. The design and construction of the sound mitigation barriers will be the responsibility of the operator and will be maintained for the operating duration of the wells.

**COA 84** - Operator will provide visual mitigation along the northern portion of the well pad (the direction towards the surface owners building unit). The design and type of visual mitigation will be the responsibility of the operator and will be agreed to by the surface owner. COGCC will require that the operator submit a Form 4 Sundry indicating that this COA has been implemented.

**COA 85** - Because of proximity of the well pad to the nearby surface water drainages to the east and northeast, operator will grade the well pad surface to slope towards the east towards the collection system. During the drilling and completion operations, there should be a retention trench and retention pond along the northern and eastern pad boundary within the bermed area. After the wells have been completed and placed into production, the pad will be pulled back from the eastern boundary and interim reclamation begun. In addition, a lined tertiary containment will be required at the production well pad location consisting of one to two lateral collection trenches/ditches along the northeast and east sides of the pad (outside of the well pad berm/ditches). The trenches will be graded to flow into one or two oversized rock-filled catchment basins located near the



northeast corner and/or the east side of the well pad. The basin(s) will be surrounded by straw waddle and/or silt fencing.

**Drilling/Completions:** The following condition of approval (COA) will apply:

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated as to not impact nearby residences.

**Wildlife:** The following best management practices (BMPs) will apply:

**BMP W1** - In order to avoid impacts to wintering big game, operator shall not construct surface disturbing activities, construction activities, drilling, or non-emergency workover activities from December 1 to April 15 annually for the life of the well. In addition, between December 1 and April 15 each year, all non-emergency activities and routine well site visitation associated with maintaining production from the facility shall occur between the hours of 10:00 am to 3:00 pm.

**BMP W2** - If fencing of the well pad is done, operator shall utilize wildlife friendly fence.

**BMP W3** - Operator shall utilize the wildlife friendly seed mix recommended by CPW for interim reclamation. If not readily available, Catamount will consult with CPW, COGCC, and the landowner to find an agreeable substitute.

COGCC has provided an example of the BMPs from another operator in La Plata County, as well as a table that provides more details as to which mitigation measures need to be addressed on the Form 2A and what COGCC is looking for. I have also attached two examples of the 306.e. certification letter required to be sent after the public/LGD comment period and after any surface owner onsite meetings. COGCC would appreciate your concurrence with attaching these COGCC COAs and the CPW BMPs to the Form 2A permit prior to passing the OGLA review. If you have any questions concerning the COAs or BMPs, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email. Thanks.

Dave

David A. Kubeczko, PG  
Oil and Gas Location Assessment Specialist  
Western Colorado



Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
Rifle, CO 81650  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

 *Please consider the environment before printing this e-mail*