

STATE OF  
COLORADO

Treitz - DNR, Rebecca &lt;rebecca.treitz@state.co.us&gt;

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**Collins 4N64W18T (doc #400785594)**

5 messages

**Kelsi Welch** <Kelsi.Welch@pdce.com>

Wed, Jun 3, 2015 at 9:34 AM

To: "Treitz - DNR, Rebecca" &lt;rebecca.treitz@state.co.us&gt;, "Noto - DNR, John" &lt;john.noto@state.co.us&gt;

Hi Rebecca and John,

After further review, PDC has made some revisions to the subject location and I believe we will no longer need to request a variance. We have reduced our number of tanks, thus pushing them out of the 200' buffer of the building. Please see attached the revised scaled facility drawing - PDC now plans to construct with 12 tanks instead of 18. Below I have included a revised 2A site rational as to why we are closer than 1000' BU. Please note that we are on a tight timeline with this as we mentioned in our meeting, so if we could get this approved as quickly as possible that would be greatly appreciated.

*PDC's main reasoning for placing the production facility closer than 1000' to a building unit is to avoid the surface owner's irrigation circle (please see location drawing for a depiction of where the irrigation circle lies relative to the facilities). The surface owner does not want the production facility any further north as he plans on building a home to the north. The production facility cannot be moved any further west because PDC needs at least 200' between the production facility and the easternmost well to lay down rig and have enough room to accommodate our frac operations. PDC cannot switch the place of the well pad and the production facility because the production facility is too long and the equipment would encroach on the surface owner's irrigation circle whereas the well pad does not have any equipment in the north end and therefore steers clear of the irrigation circle. The production facility cannot go on the west side of the well pad because it would encroach on the irrigation circle (MLVTs placed there now are okay with the surface owner because they are temporary and will not disrupt his operations). Considering this reasoning, the current placement of the production facility is the best option.*

Please let me know if you have any questions or need anything additional on this. Thank you for all of your help on this, I really appreciate all of your efforts.



Kelsi Welch

Regulatory Analyst – Progressive Consulting

PDC Energy, Inc., 1775 Sherman Street, Suite 3000, Denver, CO 80203

Office: (303) 860-5800 | Kelsi.Welch@pdce.com

**PRO SCALED FACILITY\_COLLINS 4N64W18T PAD (2015-06-03).pdf**

306K

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**Treitz - DNR, Rebecca** <rebecca.treitz@state.co.us>

Wed, Jun 10, 2015 at 12:55 PM

To: Kelsi Welch &lt;Kelsi.Welch@pdce.com&gt;

Cc: John Noto - DNR &lt;john.noto@state.co.us&gt;

Kelsi,

A few more questions on the Collins location.

1. The waste management plan does not discuss beneficial reuse, yet the 2A indicates beneficial reuse for cuttings. Please explain/define what type of beneficial reuse will be used.
2. There is a road side ditch that runs along the facility. Please provide BMPs from a stormwater standpoint regarding runoff from the site into the ditch.
3. Please provide BMPs for noise if there is a problem or complaint.

Thank you,

Rebecca

[Quoted text hidden]

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Rebecca Treitz

Oil and Gas Location Assessment Specialist

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[Rebecca.Treitz@state.co.us](mailto:Rebecca.Treitz@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**Kelsi Welch** <Kelsi.Welch@pdce.com>

Wed, Jun 10, 2015 at 2:50 PM

To: "Treitz - DNR, Rebecca" &lt;rebecca.treitz@state.co.us&gt;

Hi Rebecca,

Please see my responses to your request below:

1. This is not a request I have had before, so I have asked my team for a definition and I will let you know as soon as I hear back.
2. Please see the [Stormwater Plan attached](#). *This Stormwater Management Plan contains required elements associated with PDC's construction activities, as defined in the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, Authorization to Discharge Under the Colorado Discharge Permit System (Permit No. COR-030000, re-issued and effective July 1, 2007). BMPs for sediment and erosion control will be accomplished through a combination of construction techniques, vegetation and re-vegetation, administrative controls, and structural features.*
3. The following BMP was submitted with the permit (#23): 604c.(2).A. Noise: WELL PAD: PDC has conducted baseline noise surveys for all drilling rigs that are being contracted and has also conducted a baseline noise survey for hydraulic fracture stimulation operations on a representative horizontal well. These baseline surveys are utilized for site specific noise modeling to determine if any mitigation measures are warranted. A review was conducted to identify potential receptors within 1000 feet of the proposed pad site. There is 1 building unit of concern located 950 Feet north-east of the proposed pad. It is not anticipated that noise and light mitigation will be necessary. Should mitigation be deemed necessary after operations begin, methods of noise mitigation shall include but not be limited to hay bales, noise walls, or customized semi-trailers. PRODUCTION FACILITIES: It is not anticipated that noise mitigation will be necessary at the proposed tank battery location. After construction is completed, equipment installed and production begins, noise levels will be assessed to determine if mitigation measures will be required to be compliant with Rule 802.

Can you please advise me as to what you are looking for beyond this? I am happy to provide whatever you need, I am just not exact sure what you are looking for beyond the above BMP.

Please let me know if you have any questions or if I can provide you with anything else.

Thank you!

Kelsi

**From:** Treitz - DNR, Rebecca [mailto:[rebecca.treitz@state.co.us](mailto:rebecca.treitz@state.co.us)]  
**Sent:** Wednesday, June 10, 2015 12:55 PM  
**To:** Kelsi Welch  
**Cc:** John Noto - DNR  
**Subject:** Re: Collins 4N64W18T (doc #400785594)

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 **Storm Water Control Plan.pdf**  
1209K

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**Kelsi Welch** <[Kelsi.Welch@pdce.com](mailto:Kelsi.Welch@pdce.com)>  
To: "Treitz - DNR, Rebecca" <[rebecca.treitz@state.co.us](mailto:rebecca.treitz@state.co.us)>

Thu, Jun 11, 2015 at 8:23 AM

Hi Rebecca,

In regards to your request regarding beneficial reuse – after speaking with my EHS team, they have decided that it would be most accurate to describe PDC’s Cutting Disposal Method as “Land Application” instead of “Beneficial Reuse”. Can we please change the Form 2A to note this? Also, please see a revised version of our Waste Management Plan that outlines our current methods for land application. I apologize that this was not included on the 2A originally, I will make sure it is correct on future forms. Please let me know if there is anything else I can provide.

Thank you!

Kelsi

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**From:** Kelsi Welch  
**Sent:** Wednesday, June 10, 2015 2:51 PM  
**To:** 'Treitz - DNR, Rebecca'  
**Subject:** RE: Collins 4N64W18T (doc #400785594)

Hi Rebecca,

Please see my responses to your request below:

1. This is not a request I have had before, so I have asked my team for a definition and I will let you know as soon as I hear back.
2. Please see the Stormwater Plan attached. *This Stormwater Management Plan contains required elements associated with PDC's construction activities, as defined in the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, Authorization to Discharge Under the Colorado Discharge Permit System (Permit No. COR-030000, re-issued and effective July 1, 2007). BMPs for sediment and erosion control will be accomplished through a combination of construction techniques, vegetation and re-vegetation, administrative controls, and structural features.*
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Can you please advise me as to what you are looking for beyond this? I am happy to provide whatever you need, I am just not exact sure what you are looking for beyond the above BMP.

Please let me know if you have any questions or if I can provide you with anything else.

Thank you!

Kelsi

**From:** Treitz - DNR, Rebecca [<mailto:rebecca.treitz@state.co.us>]

**Sent:** Wednesday, June 10, 2015 12:55 PM

**To:** Kelsi Welch

**Cc:** John Noto - DNR

**Subject:** Re: Collins 4N64W18T (doc #400785594)

Kelsi,

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 **1-7-2015\_PDC EP Waste Management Plan sm.pdf**  
2142K

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**Kelsi Welch** <Kelsi.Welch@pdce.com>  
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Thu, Jun 11, 2015 at 11:28 AM

Hi Rebecca,

Per our phone conversation, please see a BMP addressing noise if there is a problem or complaint below.

If a noise complaint is received during drilling or any part of operation, PDC will send personnel to the location within 24 hours to assess the noise and determine what type of mitigation measures will be required to be compliant with Rule 802. Mitigation measures deemed necessary will be immediately installed to address the complaint. Potential mitigation measures shall include but not be limited to hay bales, noise walls, or customized semi-trailers.

Please let me know if there is anything else you need on this!

Thank you,



Kelsi Welch

Regulatory Analyst – Progressive Consulting

PDC Energy, Inc., 1775 Sherman Street, Suite 3000, Denver, CO 80203

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