

STATE OF
COLORADO

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

COGCC Form 2A review of Extraction's Cox 22-B Pad - Doc #400829097

4 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Regulatory members <regulatory@petro-fs.com>

Wed, Jun 17, 2015 at 8:51 AM

Jeff,

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

- 1) You have indicated the cuttings will be disposed of Onsite and that they will be "*mixed with additives until COGCC thresholds are met, treated material will be incorporated into reclamation fill material*". We would like a more detailed Waste Management Plan for this proposed method of Onsite cuttings disposal. The additional detail should include: What are the additives? What is the process for mixing them with the cuttings? How will you determine when COGCC thresholds are met? How will the cuttings be handled until the COGCC thresholds are met? How exactly will the treated cuttings be incorporated into reclamation fill material?
- 2) A review of your Hydrology Map shows an intermittent stream running directly through this proposed oil and gas location. Yet it is not identified on the Hydrology Map and the Water Resources section indicates the nearest downgradient surface water feature is Little Simpson Creek located 931 feet southwest. Intermittent streams/creeks should be considered when determining the nearest downgradient surface water feature. Please revise your Hydrology Map to include it and I will update the Water resources section to match it.
- 3) You have indicated the nearest water well is Permit #286939 located 5,337 feet from the proposed oil and gas location. However, during my review I identified a stock water well (Permit #296233) located approximately 2,840 feet south of the proposed oil and gas location with a static water level of 19 feet. Therefore, I would like to change the Water Resources section to reflect this.
- 4) In the Facilities Section you have indicated this proposed oil and gas location will have five wells yet your Multi-Well Plan only shows four wells. Please revise your Multi-Well Plan to depict all five proposed wells.
- 5) A review of your Access Road Map shows the proposed access road will cross Simpson Creek and Little Simpson Creek to reach this proposed oil and gas location. A review of the National Wetlands Inventory (NWI) indicates these two creeks are possibly jurisdictional waters of the US with mapped riverine and palustreine ecologies. Please see the attached screenshot taken from the NWI. You have indicated that an Army Corp of Engineers (ACOE) Section 404 permit was not filed, but was the ACOE contacted about the proposed Access Road crossing two water bodies that they may have jurisdiction over?

Please respond to this correspondence by July 17, 2015. 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
303-894-2100 Ext. 5180

 **NWI Map DA.pdf**
105K

Jeffrey Annable <jannable@petro-fs.com>

Wed, Jun 17, 2015 at 4:06 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Regulatory members <regulatory@petro-fs.com>

Hey Doug,

Please see my responses below to your questions. Apologies for some of the errors. Please let me know if the attached document outlining the BMPs for Bioremediation of Drill Cuttings has sufficient enough detail.

Thanks,

Jeff Annable

Regulatory Technician

[Petroleum Field Services LLC](#)

Office: 303-928-7128

Fax: 303-218-5678

7535 Hilltop Circle

Denver, CO 80221



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From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Wednesday, June 17, 2015 8:51 AM
To: Regulatory members
Subject: COGCC Form 2A review of Extraction's Cox 22-B Pad - Doc #400829097

Jeff,

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

1) You have indicated the cuttings will be disposed of Onsite and that they will be "*mixed with additives until COGCC thresholds are met, treated material will be incorporated into reclamation fill material*". We would like a more detailed Waste Management Plan for this proposed method of Onsite cuttings disposal. The additional detail should include: What are the additives? What is the process for mixing them with the cuttings? How will you determine when COGCC thresholds are met? How will the cuttings be handled until the COGCC thresholds are met? How exactly will the treated cuttings be incorporated into reclamation fill material? **Please see attached a list of BMPs that can be added that address these questions.**

2) A review of your Hydrology Map shows an intermittent stream running directly through this proposed oil and gas location. Yet it is not identified on the Hydrology Map and the Water Resources section indicates the nearest downgradient surface water feature is Little Simpson Creek located 931 feet southwest. Intermittent streams/creeks should be considered when determining the nearest downgradient surface water feature. Please revise your Hydrology Map to include it and I will update the Water resources section to match it. **Please see attached an updated hydrology map with the intermittent stream called out with a distance of 0'. Below are some additional BMPS for the stream being so close:**

Storm Water/Erosion Control

Use water bars, and other measures to prevent erosion and non-source pollution. Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site

degradation. Co-locate gas and water gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any pipeline(s).

Construction

Containment berms shall be constructed and designed to prevent leakage and resist degradation from erosion or routine operation. Tertiary containment, such as an earthen berm, will be installed as required for Production Facilities within 500 feet of a downgradient surface water feature. All berms will be visually checked periodically to ensure proper working condition.

3) You have indicated the nearest water well is Permit #286939 located 5,337 feet from the proposed oil and gas location. However, during my review I identified a stock water well (Permit #296233) located approximately 2,840 feet south of the proposed oil and gas location with a static water level of 19 feet. Therefore, I would like to change the Water Resources section to reflect this. **I agree with you. That does appear to be the nearest water well.**

4) In the Facilities Section you have indicated this proposed oil and gas location will have five wells yet your Multi-Well Plan only shows four wells. Please revise your Multi-Well Plan to depict all five proposed wells. **Attached is an updated Multi-Well Plan.**

5) A review of your Access Road Map shows the proposed access road will cross Simpson Creek and Little Simpson Creek to reach this proposed oil and gas location. A review of the National Wetlands Inventory (NWI) indicates these two creeks are possibly jurisdictional waters of the US with mapped riverine and palustreine ecologies. Please see the attached screenshot taken from the NWI. You have indicated that an Army Corp of Engineers (ACOE) Section 404 permit was not filed, but was the ACOE contacted about the proposed Access Road crossing two water bodies that they may have jurisdiction over? **Will contact the operator to see if they have contacted the ACOE regarding the proposed access road, and will let you know the outcome.**

Please respond to this correspondence by July 17, 2015. 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

303-894-2100 Ext. 5180

3 attachments



Cox 22-B Pad 12N64W22 Multi Well Plan.pdf
121K



Bioremediation of Drill Cuttings.pdf
31K



Cox 22-B Pad 12N64W22 Hydrology Map.pdf
841K

Jeffrey Annable <jannable@petro-fs.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Jun 25, 2015 at 9:20 AM

Hey Doug,

See below for Extraction's response to item 5:

On June 24, 2015, Extraction Oil and Gas met on-site with a wetlands specialist to evaluate the proposed crossings of the Little Simpson and Simpson Creeks. The disturbed areas associated with the proposed crossings were evaluated and delineated as necessary and were determined to be under the triggering thresholds for Army Corp of Engineer (ACOE) involvement. Therefore, Extraction will be operating under Nationwide Permit 14 for linear transportation projects which does not require ACOE involvement.

I believe this completes the response to your email sent below. Please let me know if there is anything else that you need from me.

Thanks,

Jeff Annable

Regulatory Technician

Petroleum Field Services LLC

Office: 303-928-7128

Fax: 303-218-5678

7535 Hilltop Circle

Denver, CO 80221



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Sent: Wednesday, June 17, 2015 8:51 AM
To: Regulatory members
Subject: COGCC Form 2A review of Extraction's Cox 22-B Pad - Doc #400829097

Jeff,

[Quoted text hidden]

Jeffrey Annable <jannable@petro-fs.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Regulatory members <regulatory@petro-fs.com>

Thu, Jun 25, 2015 at 9:38 AM

Hey Doug,

See below for Extraction's response to item 5:

"On June 24, 2015, Extraction Oil and Gas met on-site with a wetlands specialist to evaluate the proposed crossings of the Little Simpson and Simpson Creeks. The disturbed areas associated with the proposed crossings were evaluated and delineated as necessary and it was determined that they are below the required thresholds for the Army Corp of Engineer (ACOE) involvement. Therefore, Extraction will be operating under Nationwide Permit 14 for linear transportation projects which does not require ACOE involvement."

I believe this completes the response to your email sent below. Please let me know if there is anything else that you need from me.

Thanks,

Jeff Annable

Regulatory Technician

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