

STATE OF
COLORADO

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

COGCC Form 2A review of Whiting's Cottonwood 07M Pad - Doc #400977456

2 messages

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

Mon, Mar 7, 2016 at 11:46 AM

To: Michael Brown <ml_brown@bresnan.net>

Michael,

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

1) Your Location Drawing indicates 16 wells on this proposed Oil & Gas Location and that the Cottonwood Fed 07M-1933 well was used as a reference point for determining distances to both visible surface improvement within 500 feet and the various Cultural features (Building, Building Unit, Public Road, etc.). However, Whiting has indicated that only eight wells are being permitted on this location at this time and the Cottonwood Fed 07M-1933 well is not one of those wells. Therefore the distances to the Cultural features from the Cottonwood Fed 07M-1933 well should not be used on this 2A. The eight wells currently being permitted should be used as the reference point and for determining the Cultural distances. Please revise the Location Drawing, the reference point latitude & longitude, the reference point footages to the Section lines, and the distances to the Cultural items from the nearest well to be based on one of the eight wells being permitted on this 2A.

2) In the Water Resources section you have indicated this proposed Oil & Gas Location is not a Sensitive Area. However, the nearest downgradient surface water feature (a pond 442 feet to the northwest) is mapped by US Fish and Wildlife Service as a freshwater emergent wetland. Your Location Drawing shows your planned disturbance boundary to extend to this pond. Therefore, I would like to change the Sensitive Area designation to indicates YES.

3) Based on the proximity of this wetland pond to your proposed disturbance as discussed in my Comment #4 above, please provide me with a site specific construction Best Management Plan on how Whiting will protect this pond from impacts and releases related to the drilling, construction, and production operations at this proposed Oil and Gas Location.

4) A review of your Waste Management Plan from Talon LPE leaves out some detailed information that we'd like addressed. It indicates the frequency of sampling is per every 100 cubic yards of cuttings. It does not specify how many samples or the type (discrete grab, composite, etc.) per every 100 cubic yards. It does not specify how frequently time-wise the sampling will occur. It also does not indicate what Whiting will do if the cuttings do not meet Table 910-1 standards by the time interim reclamation begins (six months after construction starts). This is particularly concerning as these proposed wells are two mile laterals, will generate large amounts of cuttings, and their treatment must be completed by the time interim reclamation begins. Please revise the Waste Management Plan to address these concerns.

Please respond to this correspondence by April 7, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & 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
303-894-2100 Ext. 5180

Michael L. Brown <ml_brown@bresnan.net>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Mar 22, 2016 at 1:23 PM

Doug,

1) I have attached a revised location drawing. Here are the changes to the 2A.

Ground Elevation: 4630
Footage at Surface: 355 FSL, 877 FWL
Latitude: 40.759844
Longitude: -103.799598
Disturbed Area: 13.21
Post-construction Elev: 4627

Well Distance:
Building: 3550
Bldg Unit: 3550
Public Road: 4110
Property Line: 355

2) Yes, change to Sensitive Area designation.

3) To protect the adjacent reservoir, The northwest corner has been cutoff to provide additional vegetative buffer, fill slope has been reduced to 5:1, a diversion ditch will be installed at the bottom of fill slope and directed to sediment traps. See attached Cut & Fill for location of BMPs.

4) See attached Drill Cuttings WMP.

Let me know if you need anything else.

Thanks,
Michael L. Brown
[307-237-9310](tel:307-237-9310)

[Quoted text hidden]

3 attachments



Drill Cuttings WMP_revised.pdf
24K



Location Drawing rev1.pdf
145K



Cut & Fill Diagram Stormwater BMPs.pdf
679K