



STATE OF
COLORADO

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

RE: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

7 messages

Venessa Langmacher <Venessa.Langmacher@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, May 12, 2016 at 9:00 AM

Hi Doug,

Please see my comments below:

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Thursday, May 12, 2016 8:02 AM
To: Venessa Langmacher <Venessa.Langmacher@pdce.com>
Subject: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

Venessa,

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

1) In the Cultural Distance section you have indicated the nearest Building Unit to an oil and gas well is 971 feet. A review of your Scaled Facility Layout Drawing indicates the nearest Building Unit to an oil and gas well is 917 feet. My review also indicates this nearest Building Unit is 917 feet from an oil and gas well well. Therefore, I would like to change the distance from 971 feet to 917 feet. **917 is correct – that was my dyslexia ☺**

2) During my review it appears that a portion of this proposed oil and gas location will overlap onto the 38-Nelson fine sandy loam, 3-9% slopes NRCS Soil Map Unit. Therefore, please send the NRCS Map Unit Description for this soil unit and I will add it to the Form 2A. **Attached**

3) In the Facilities section you have indicated there will be no water tanks, only six 500-bbl temporary water tanks during the high water production phase of the wells. Will these temporary tanks be bermed as described in your Berm Construction BMP for the permanent tank battery? If not, what measures will PDC take to mitigate a spill or release from these temporary tanks? Will there be vapor emissions and odor controls associated with these temporary tanks as described in your Emissions and Odor mitigation BMPs for the permanent tank battery? If not, how will PDC mitigate any vapor or odor emissions from these tanks

should a petroleum sheen form? **Yes, the BMPs hold true for the temp water tanks as well.**

4) You have included an attachment requesting an exception to the Rule 305.a., 305.c., 306.e., and MIRU Policy; however, no Designated Setback Location Exception was checked on the Form 2A. If none of those Designated Setback Location Exceptions apply to this proposed Oil and Gas Location, I would like to remove that exception request letter. The signed waiver from the Surface Owner waiving these notifications and meetings requirements does not require an Exception Request letter and will remain on the Form 2A. **I am in agreement with removing the exception request letter.**

Please respond to this correspondence by June 12, 2016. 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

 **NRCS.PDF**
120K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Venessa Langmacher <Venessa.Langmacher@pdce.com>

Thu, May 12, 2016 at 11:09 AM

Venessa,

In regards to your answer to my Comment #3, will you re-word some of your BMPs to clearly indicate it applies to both the permanent and temporary tanks on the location? Specifically, BMP #11 - Berm Construction & BMP #19 - Odors and Dust. Also, you indicate "the temporary water tanks will be onsite during the high water production phase of the wells. These tanks will be onsite until water production levels decrease." This a fairly recent development we are seeing on permits and we are curious about it. Will you provide us with what PDC considers to be the high water production phase and an estimate as to how long that is likely to occur? 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

[Quoted text hidden]

Venessa Langmacher <Venessa.Langmacher@pdce.com>

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

Thu, May 12, 2016 at 11:24 AM

I will get this info to you as soon as I can!

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

Sent: Thursday, May 12, 2016 11:10 AM

To: Venessa Langmacher <Venessa.Langmacher@pdce.com>

Subject: Re: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

Venessa,

In regards to your answer to my Comment #3, will you re-word some of your BMPs to clearly indicate it applies to both the permanent and temporary tanks on the location? Specifically, BMP #11 - Berm Construction & BMP #19 - Odors and Dust. Also, you indicate "the temporary water tanks will be onsite during the high water production phase of the wells. These tanks will be onsite until water production levels decrease." This a fairly recent development we are seeing on permits and we are curious about it. Will you provide us with what PDC considers to be the high water production phase and an estimate as to how long that is likely to occur? Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

[Quoted text hidden]

[Quoted text hidden]

Venessa Langmacher <Venessa.Langmacher@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, May 17, 2016 at 1:20 PM

Hi Doug,

Do these BMPs work?

604c.(2).G. Berm Construction: Containment berms for Permanent and Temporary Equipment shall be constructed of steel rings with a geosynthetic liner, designed and installed to prevent leakage and resist degradation from erosion or routine operation. All berms will be visually checked periodically to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Due to a downgradient surface water body within 500', tertiary containment (such as an earthen berm or the like), will be installed around Production Facilities.

805.b(1)-(c) Odors and Dust: Oil and gas facilities and equipment (PERMANENT AND TEMPORARY) will operate in a manner that odors and dust do not constitute a nuisance or hazard to public welfare. Odors: Oil and gas operations will be in compliance with the Department of Public Health and Environment, Air Quality Control Commission, Regulation No. 2 Odor Emission, 5 C.C.R. 1001-4, Regulation No. 3 (5 C.C.R. 1001-5), and Regulation No. 7 Section XVII.B.1 (a-c) and Section XII. Dust; PDC will employ practices for control of fugitive dust caused by operations include but not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic.

During initial production we are noticing a high amount of water production, hence the need for the temporary tanks. The tanks will only be onsite 6-9 months.

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Thursday, May 12, 2016 11:10 AM
To: Venessa Langmacher <Venessa.Langmacher@pdce.com>
Subject: Re: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

Venessa,

In regards to your answer to my Comment #3, will you re-word some of your BMPs to clearly indicate it applies to both the permanent and temporary tanks on the location? Specifically, BMP #11 - Berm Construction & BMP #19 - Odors and Dust. Also, you indicate "the temporary water

tanks will be onsite during the high water production phase of the wells. These tanks will be onsite until water production levels decrease." This a fairly recent development we are seeing on permits and we are curious about it. Will you provide us with what PDC considers to be the high water production phase and an estimate as to how long that is likely to occur? Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

[Redacted]

[Quoted text hidden]

[Quoted text hidden]

Venessa Langmacher <Venessa.Langmacher@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, May 19, 2016 at 2:50 PM

Good Afternoon!

Is there any chance you could let me know if the information below regarding the temp water tanks is sufficient before I respond to the Elvera email request? I just want to make sure I am providing you everything that you have requested.

Thanks!

From: Venessa Langmacher
Sent: Tuesday, May 17, 2016 1:21 PM
To: 'Andrews - DNR, Doug' <doug.andrews@state.co.us>
Subject: RE: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

[Quoted text hidden]

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Venessa Langmacher <Venessa.Langmacher@pdce.com>

Fri, May 20, 2016 at 8:25 AM

Venessa,

Thank you for the revised BMPs and additional info on the anticipated timeframe the temporary water tanks will be onsite. I will add them to the Form 2A.

Now that the Public Comment period has ended for this Buffer Zone location, please send me a letter that certifies PDC Energy has complied with COGCC Rule 306.e. If any meetings or consultation were requested and/or held, please also indicate their outcome. 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

[Quoted text hidden]

Venessa Langmacher <Venessa.Langmacher@pdce.com>

Fri, May 20, 2016 at 10:42 AM

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

Attached is the 306e certification. Please let me know if you need any additional information.

Thanks and have a great weekend!

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]

Sent: Friday, May 20, 2016 8:26 AM

To: Venessa Langmacher <Venessa.Langmacher@pdce.com>

Subject: Re: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Carlson 6N64W7SW location - Doc #401026878

Venessa,

Thank you for the revised BMPs and additional info on the anticipated timeframe the temporary water tanks will be onsite. I will add them to the Form 2A.

Now that the Public Comment period has ended for this Buffer Zone location, please send me a letter that certifies PDC Energy has complied with COGCC Rule 306.e. If any meetings or consultation were requested and/or held, please also indicate their outcome. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]



306e Meeting Requirements Certification Letter to Director_NO MEETING_Ca....pdf

254K