



STATE OF  
COLORADO

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

## COGCC Form 2A review of Crescent Point Energy's Shull Pad 9-59-31-SENW - Doc #401047449

2 messages

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

Tue, Jun 7, 2016 at 10:27 AM

Lauren,

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

- 1) In the Drilling Program section you have indicated that salt based mud will be used. This is unusual as none of the other operators in this immediate area (Carrizo Niobrara and Noble Energy) indicated they would use salt based mud when permitting their wells. Please confirm that the Crescent Point Energy intends to use salt based mud.
- 2) You have added an Operator Comment indicating Reference Area Photos will be submitted via Form 4 Sundry Notice within 12 months approval of the Form 2A. I would like to add that comment as a Best Management Practice (BMP) on the Form 2A as well. Please let me know if that is acceptable.
- 3) In the Water Resources section you have indicated the nearest downgradient surface water feature (Wild Horse Creek) is 70 feet from the proposed Oil & Gas Location. Due to its proximity, I would like to be conservative and have the Form 2A indicate that YES, this proposed Oil & Gas Location is in a sensitive area.
- 4) Due to the proximity of Wild Horse Creek to this proposed Oil & Gas Location, I would like to add the following Condition of Approval: *"Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect Wild Horse Creek located 70 feet south of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."* Please let me know if this COA is acceptable. Otherwise, please provide me with a site specific BMP that will protect Wild Horse Creek from a release of drilling, completion, produced fluids, and chemical products.

Please respond to this correspondence by July 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](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

---

**Lauren MacMillan** <[lmacmillan@crescentpointenergy.com](mailto:lmacmillan@crescentpointenergy.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Thu, Jul 7, 2016 at 4:03 PM

Hi Doug,

In response to your questions/comments for the Shull Pad 9-59-31-SENE Form 2A:

- 1) Salt based mud **will not** be used in CPE's proposed drilling program.
- 2) Attached please find updated reference area photos taken during the growing season.
- 3) I understand your rationale and am in agreement that the proposed Oil & Gas Location is in a sensitive area due to the proximity to Wild Horse Creek.
- 4) Crescent Point agrees to the proposed COA.
- 5) Crescent Point contracted Grasslands Consulting to perform a wetland delineation and Waters of the United States (WOTUS) assessment for the 34-well Anderson/Shull development project. Field assessment/surveys were conducted in April and again in May 2016 during the growing season. No wetlands were documented in the vicinity of the proposed development however Wild Horse Creek was determined to be a jurisdictional WOTUS and thus is regulated by the US Army Corps of Engineers (USACE). The proposed co-located access road/pipeline ROW between the Shull Pad 9-59-31-SENE and Shull Pad 9-59-31-NESW crosses Wild Horse Creek and will require a USACE Nationwide Permit (NWP) 12 for utility line activities and NWP 14 for linear transportation projects. To streamline the permitting and federal consultation process, Crescent Point intends to submit the USACE NWP 12 & 14 concurrent to the BLM APDs. Crescent Point will provide a copy of the approved USACE permits to the COGCC via Form 4 Sundry Notice prior to commencing dirt work.

Thanks Doug- please let me know if you need anything else from Crescent Point on this location.

Have a nice evening,

Lauren

**From:** Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]  
**Sent:** Tuesday, June 07, 2016 10:28 AM

7/8/2016

State.co.us Executive Branch Mail - COGCC Form 2A review of Crescent Point Energy's Shull Pad 9-59-31-SEnw - Doc #401047449

**To:** Lauren MacMillan

**Subject:** COGCC Form 2A review of Crescent Point Energy's Shull Pad 9-59-31-SEnw - Doc #401047449

[Quoted text hidden]



**Shull Pad 9-59-31-SEnw Reference Photos V2 06082016.pdf**

519K