

STATE OF
COLORADO

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

COGCC Form 2A review of Bayswater Exploration's Thornton 28-H Pad location - Doc #401053788

2 messages

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

Mon, Aug 29, 2016 at 2:29 PM

Jeff,

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

- 1) In our phone conversation this morning, we discussed the fact the PDC Energy still has a valid Form 2A for a production facility on this Oil & Gas Location. It appears that as part of the SUA Bayswater Exploration has an understanding with PDC Energy and the City of Thornton to use a portion of the surface of the land for their oil and gas operations. As PDC Energy's Form 2A for their production facility and well pad will expire very soon, does Bayswater Exploration know if PDC still has any intentions to conduct oil and gas operations on this land?
- 2) In the Water Resources section you have indicated that this Oil & Gas Location is in a mapped floodplain. Per COGCC Rule 603.h.(1)B - ...*"new wells must be equipped with remote shut-in capabilities prior to commencing production. Remote shut-in capabilities include, at a minimum, the ability to shut-in the well from outside the relevant Floodplain."* Please provide a Best Management Practice (BMP) that details how Bayswater Exploration will comply with this requirement.
- 3) The Noise mitigation BMP only discusses noise mitigation related to the drilling and completion operations. As Bayswater Exploration has proposed several compressors on this Oil & Gas Location, please provide additional detail on how Bayswater Exploration will mitigate noise associated with the compressors.
- 4) Now that the Public Comment period has ended, please send me a letter certifying Bayswater Exploration's compliance with COGCC Rule 306.e. If any meeting and/or consultations were held, please also indicate their outcome.

Please respond to this correspondence by September 29, 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

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Jeffrey Annable <jannable@petro-fs.com>

Mon, Aug 29, 2016 at 3:54 PM

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

Hey Doug,

Please see my response below.

Thanks,

Jeff Annable

Regulatory Analyst

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7535 Hilltop Circle

Denver, CO 80221

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

Sent: Monday, August 29, 2016 2:30 PM

To: Regulatory Group

Subject: COGCC Form 2A review of Bayswater Exploration's Thornton 28-H Pad location - Doc #401053788

Jeff,

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

1) In our phone conversation this morning, we discussed the fact the PDC Energy still has a valid Form 2A for a production facility on this Oil & Gas Location. It appears that as part of the SUA Bayswater Exploration has an understanding with PDC Energy and the City of Thornton to use a portion of the surface of the land for their oil and gas operations. As PDC Energy's Form 2A for their production facility and well pad will expire very soon, does Bayswater Exploration know if PDC still has any intentions to conduct oil and gas operations on this land? **Bayswater has an extensive surface and subsurface agreement with PDC that is outlined in the attached SUA. Bayswater believes that PDC doesn't have any intention on renewing the current locations and APDs.**

2) In the Water Resources section you have indicated that this Oil & Gas Location is in a mapped floodplain. Per COGCC Rule 603.h.(1)B - ...*"new wells must be equipped with remote shut-in capabilities prior to commencing production. Remote shut-in capabilities include, at a minimum, the ability to shut-in the well from outside the relevant Floodplain."* Please provide a Best Management Practice (BMP) that details how Bayswater Exploration will comply with this requirement. **Please add the following BMP "Operator will have remote shut-in capabilities for all of the wells that are drilled on this pad. At a minimum, this remote shut-in capability will be operable outside of the relevant floodplain."**

3) The Noise mitigation BMP only discusses noise mitigation related to the drilling and completion operations. As Bayswater Exploration has proposed several compressors on this Oil & Gas Location, please provide additional detail on how Bayswater Exploration will mitigate noise associated with the compressors. **The third paragraph in the Noise mitigation BMP section address mitigation measures for compressors that are on location.**

4) Now that the Public Comment period has ended, please send me a letter certifying Bayswater Exploration's compliance with COGCC Rule 306.e. If any meeting and/or consultations were held, please also indicate their outcome. **Attached.**

Please respond to this correspondence by September 29, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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Thornton 28-H Pad Rule 306e Completeness Cert to Director.pdf
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