



STATE OF  
COLORADO

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

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**RE: [EXTERNAL] :COGCC Amended Form 2A review for PDC Energy's Johnson 6N64W16D location - Doc #401151602**

1 message

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

Tue, Jan 3, 2017 at 2:19 PM

Good Afternoon Doug!

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Tuesday, December 27, 2016 7:23 AM  
**To:** Venessa Chase <[Venessa.Chase@pdce.com](mailto:Venessa.Chase@pdce.com)>  
**Subject:** [EXTERNAL] :COGCC Amended Form 2A review for PDC Energy's Johnson 6N64W16D location - Doc #401151602

Venessa,

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

1) In the Drilling Waste Management Program section you have indicated the drilling fluids and cuttings will be disposed Offsite, but did not provide the disposal method for both. Please let me know what each disposal method is and I will add it to the Form 2A.

Drill cuttings will be land applied at PDC spread fields with COGCC Facility ID 444255, 159534, or 436033.

2) In the Facilities section you have indicated there will be 11 wells on the Oil & Gas Location (the existing PDC State Lease 81 #43-16 well and 10 new wells); however, the Cultural Setback distances are based on the nearest of the 10 proposed new wells and do not take into account the existing well. The existing well is closer to a Building, Building Unit, and Property Line than any of the 10 proposed wells. But you also have an Operator Comment indicating the existing State Lease 81 #43-16 well will be plugged and abandoned. If the existing well will be P&A'd during the construction of the new wells and production facilities, I think it would be better to change the Facilities section to indicate 10 wells instead of 11. If the existing well will continue to produce for sometime after the construction of the new wells and production facilities, the Cultural Setback distances from the nearest well need to be revised to consider that existing well. Let me know how PDC Energy wishes to proceed. [The existing well will be plugged prior to the drilling of these proposed wells. I agree with changing the number of wells to 10.](#)

3) In the Facilities section the list of production facilities does not include the existing tank battery. I assume the existing tank battery will be removed during construction of the new production facilities. If this is not the case please let me know the count of the tank battery facilities and I will add them the to the Facilities section. [The existing tank battery will be removed.](#)

4) Your Noise Mitigation BMP indicates there are Building Units within 1,000 feet of this Oil & Gas Location to the east, northwest, west, and southwest. However, it indicates that light and sound mitigation will be installed only to the north and east of the location. What is PDC Energy planning to do to mitigate noise and light for those Building Units to the northwest, west, and southwest of the proposed location?

[The houses SW are only within 1000' of the MLVT area, and further than 1000' away from the drill pad and facilities. However, we will be placing portable panels around our pumps and point our lights to the east. The BU to the NW will be covered by the sounds wall placed across the north of the location.](#)

5) Please confirm that the temporary water tanks will be bermed and have odor/emission controls similar to the permanent tanks/production facilities. [Correct](#)

6) Now that the Public Comment period has ended, please provide me with a letter certifying PDC Energy's compliance with COGCC Rule 306.e. If any meetings/consultations were held, please also indicate their outcome.

[Attached](#)

Please respond to this correspondence by January 27, 2017. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



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**306e Meeting Requirements Certification Letter to Director\_Johnson.pdf**  
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