



STATE OF  
COLORADO

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

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## raindance interim reclamation variance request.

6 messages

**Scot Donato** <sdonato@gwogco.com>

Fri, Apr 7, 2017 at 9:48 AM

To: "Margaret Ash (margaret.ash@state.co.us)" <margaret.ash@state.co.us>, "Andrews - DNR, Doug (doug.andrews@state.co.us)" <doug.andrews@state.co.us>, "Noto - DNR, John" <john.noto@state.co.us>

Cc: Eric Creed <ecreed@gwogco.com>

All:

We formally request removal of this variance request. We've deemed it not necessary at this time.

Thanks for your help on it. Let me know if you need more info from us.

Scot



### Scot Donato

Vice President Government Affairs/EH&S

Great Western Operating Company, LLC

1801 Broadway, Suite 500

Denver, CO 80202

Direct: [303-398-0537](tel:303-398-0537)

Email: [sdonato@gwogco.com](mailto:sdonato@gwogco.com)

Fri, Apr 7, 2017 at 9:57 AM

**Ash - DNR, Margaret** <margaret.ash@state.co.us>

To: Scot Donato &lt;sdonato@gwogco.com&gt;, John Noto - DNR &lt;john.noto@state.co.us&gt;, "Andrews, Doug" &lt;Doug.Andrews@state.co.us&gt;

Scot,

Does this mean you will be conducting interim reclamation?

Margaret Ash

Field Inspection Unit Manager

 co\_dnr\_div\_ogcc\_300\_rgb\_ltrhd\_v3

P 303.894.2100 x5110 | F 303.894.2109 | C 303.548.6298

1120 Lincoln Street, Suite 801, Denver, CO 80203

margaret.ash@state.co.us | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**Scot Donato** <sdonato@gwogco.com>

Fri, Apr 7, 2017 at 10:28 AM

To: "Ash - DNR, Margaret" &lt;margaret.ash@state.co.us&gt;, John Noto - DNR &lt;john.noto@state.co.us&gt;, "Andrews, Doug" &lt;Doug.Andrews@state.co.us&gt;

We'll be addressing it when the time comes-we don't even have a permit yet. Seemed premature.

**Scot Donato**

Vice President Government Affairs/EH&amp;S

Direct: 303-398-0537

Email: [sdonato@gwogco.com](mailto:sdonato@gwogco.com)

**From:** Ash - DNR, Margaret [mailto:[margaret.ash@state.co.us](mailto:margaret.ash@state.co.us)]  
**Sent:** Friday, April 7, 2017 9:57 AM  
**To:** Scot Donato; John Noto - DNR; Andrews, Doug  
**Subject:** Re: raindance interim reclamation variance request.

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

Fri, Apr 7, 2017 at 1:21 PM

To: Scot Donato <sdonato@gwogco.com>

Cc: "Ash - DNR, Margaret" <margaret.ash@state.co.us>, John Noto - DNR <john.noto@state.co.us>, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Scot,

The issue with interim reclamation was pretty much the only thing remaining for me to handle with the Raindance 2As as far as the technical review goes. With this Variance request being pulled, we would be looking for Great Western to indicate how the acreage of the disturbed area for both pads will change from during construction to after interim reclamation. They were both submitted with the acreages between construction and interim reclamation being the same (indicating no interim reclamation would be occurring). Please take a look at them and let us know how much Great Western will pull these pads back after interim reclamation and I can update that info on both 2As. Thanks.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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

Mon, Apr 10, 2017 at 10:34 AM

To: Margaret Ash - DNR <margaret.ash@state.co.us>

Margaret,

Here is my reply to Scot requesting Great Western revise the after interim reclamation acreage on both the well pad and tank battery 2A.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

----- Forwarded message -----

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

Date: Fri, Apr 7, 2017 at 1:21 PM

Subject: Re: raindance interim reclamation variance request.

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**Deranleau - DNR, Greg** <[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)>

Mon, Apr 10, 2017 at 5:49 PM

To: Doug Andrews <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Cc: John Noto - DNR <[john.noto@state.co.us](mailto:john.noto@state.co.us)>, "Ash, Margaret" <[margaret.ash@state.co.us](mailto:margaret.ash@state.co.us)>

COGCC folks,

We need to come up with a workable solution for this and other sites like it. The operator has proposed sites with minimal extra surface land in close consultation with the surface owner and mindful of COGCC and local government desires. They are going to use the sites and leave them at their original size until it is time for final reclamation. They have significant LANDSCAPING plans. This is not reclamation of an agricultural field or an undisturbed prairie. This site is being incorporated into the overall development plan and we should give deference to that process.

Other than because of the limitations of the language in our rules, I really don't see why a variance should be required. So if it's required, I don't see why we wouldn't approve it. If we are really concerned about this or similar sites becoming a liability to the state, then additional financial assurance could be required, but I'm not sure why those concerns would be valid since the surface owner is completely on board with this.

The operator has provided sufficient information that we understand what their plans are and how they fit into the overall development plan; as long as that is well documented and verified, we should be good to go.

It seems like we are being bureaucratic for the sake of bureaucracy. There has to be a better solution. I don't think our handling of this so far meets the threshold for efficient, effective, or elegant. If I were the operator, I would be pretty frustrated right now.

Thanks  
Greg

Sent from my mobile device.

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