

STATE OF
COLORADO

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

COGCC Form 2A review of Brown Oil & Gas' Casement 2 location - Doc #401537500

9 messages

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

To: brown_oil_and_gas@hotmail.com

Fri, Apr 13, 2018 at 9:42 AM

Mark & Roberta,

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

- 1) You have submitted this Form 2A as a Refile for the existing Casement 2 Oil & Gas Location (Location ID #389047). However, there are a few changes indicated on this Form 2A from the one that was previously permitted in 2013. That would make this an Amended Form 2A, not a Refile Form 2A. Therefore, I have updated this Form 2A to so indicate.
- 2) You have included an operator comment on the Form 2A indicating "*There will not be a production facility onsite.*". Where will any oil, gas, and/or water produced by this well go to? Please provide me the name and Location ID # for that production facility/tank battery location and I will add that info to this Form 2A. This is one of the changes I referenced in my Comment #1 above as Singletree Resources originally permitted this location with production facilities onsite.
- 3) In the Drilling Waste Management Program section you have indicated the drilling fluids will be disposed of onsite via Land Application and drill cutting will be disposed of onsite, but no cuttings disposal method was indicated. Please provide the method for how drill cuttings will be disposed of onsite and provide a Waste Management Plan that describes how the disposal of drilling fluids and drill cuttings will be disposed of in compliance with COGCC Rule 907.d. COGCC Rule 907.d. does allow for drilling fluids to be dried and buried in a drilling pit, but the concentrations shall not exceed Table 910-1 standards. COGCC Rule 907.d. does allow for drill cuttings to be disposed of onsite via construction and maintenance of berms and lease roads. COGCC Rule 907.d. also requires written surface owner consent prior to disposal onsite. The Waste Management Plan should discuss these requirements/allowances as it provides us a document that indicates your awareness of this Rule. This is also one of the changes referenced in my Comment #1 above. During our review of the original Form 2A drilling fluid and cuttings disposal was discussed with Singletree Resources. They decided to change it from onsite to offsite at a commercial disposal facility.
- 4) During my review it appears the nearest Public Road and Above Ground Utility is closer than the distances listed in the Cultural Setback section on this Form 2A. It appears the nearest Public Road is Logan County Road 70 approximately 600 feet south. It appears the nearest Above Ground Utility is approximately 400 feet east. These two distance also more closely match with what Singletree Resources indicated on their original Form 2A and appears to still be the case presently. Please review these two distance and provide me with updated distances from both a well and production facility.
- 5) In the Cultural Setback Distance section you have indicated the nearest Property Line to a well is 2,300 feet and to a production facility is 1,314 feet. Is this 1,000 foot difference in distance to a property line correct? The difference in distance for the other cultural features is not this great.

6) In the Land Use section you have indicated the Land Use is Rangeland. When this is the case, COGCC Rules require operators to provide two attachments on the Form 2A. A Reference Area Map showing where the operator has chosen a nearby piece of undisturbed ground that will be used as a Reference to determine if future interim and final reclamation of the pad has been successfully achieved. Reference Area Pictures that show how the chosen Reference Area currently appears so that we can confirm that the future interim and final reclamation is successful. These two attachments are the operators way of saying to the COGCC "When we are done working out here we will reclaim our well pad to look like this nearby area of undisturbed ground located as shown on the Reference Area Map and should look as shown on the Reference Area Pictures."

6) In the Water Resources section you have indicated the estimated depth to groundwater is 80 feet. During my review it appears an estimated depth of 46 feet, which is what was approved on the Form 2A from Singletree Resources, is still valid. Therefore I would like to change this depth from 80 feet to 46 feet.

Please respond to my correspondence by May 13, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



303.894.2100 Ext. 5180
1120 Lincoln St., Suite 801, Denver, CO 80203
doug.andrews@state.co.us | <http://cogcc.state.co.us/>

Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Apr 16, 2018 at 11:18 AM

Good Morning,

Thank you for your assistance with Form 2A. I have looked into your email here and have some answers and questions myself about your comments.

1) We were told to file form 2A as a "refile". Amended is fine, thank you for correcting it.

2) Your second comment indicates we changed the production facility from onsite to offsite. We were not aware of this. The form 2A that I have from SingleTree Resources is a single page document so this information was not listed there. I also cannot find a different document on the COGCC site showing what the COGCC did or did not permit for the Casement 2. I have included an attachment of the 2A we received and the 2A that is provided on your site as reference. If there is a different one from SingleTree Resources can you please provide that information to us, so going forward our paperwork stays correct.

The production facility we would like to use would be the Julie Campbell 1, location id 312325.

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Friday, April 13, 2018 9:42 AM
To: brown_oil_and_gas@hotmail.com
Subject: COGCC Form 2A review of Brown Oil & Gas' Casement 2 location - Doc #401537500

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Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Apr 16, 2018 at 11:59 AM

Brown Oil and Gas LLC has shared a OneDrive file with you. To view it, click the link below.



 Casement 2 - form 2A.pdf

Sorry forgot to get the attachment on the previous email.

Roberta Brown
Brown Oil & Gas LLC
Brown Oilfield Services LLC
10481 CR 20.5
Sterling, CO 80751
970/522-1072 Phone
970/521-0187 Fax

From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Friday, April 13, 2018 9:42 AM
To: brown_oil_and_gas@hotmail.com
Subject: COGCC Form 2A review of Brown Oil & Gas' Casement 2 location - Doc #401537500

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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>

Mon, Apr 16, 2018 at 2:55 PM

Mark, Roberta, & Courtney,

Thank you.

Oil & Gas Location Assessment Specialist - Northeast Colorado



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 **Singletree Resources approved Form 2A.pdf**
100K

Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Apr 17, 2018 at 12:46 PM

Hello,

Thank you so much for the copy of the previous form 2A. I was comparing the old 2A (SingleTree Resources) to the current one that I am working on now and had a question about the drilling waste management program. Does the COGCC refer to drilling fluids and cuttings as being the same as mud disposal? In 2013 it was referred to as mud disposal on the form, but the form I am currently

completing refers to drilling cuttings and fluids? I would assume they are the same but, I just want to be sure that we cover everything. I will also be sure to get four new rangeland observation pictures done and attached online.

Thanks again,

Courtney Brown

Roberta Brown

Brown Oil & Gas LLC

Brown Oilfield Services LLC

10481 CR 20.5

Sterling, CO 80751

970/522-1072 Phone

970/521-0187 Fax

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

Sent: Monday, April 16, 2018 2:55 PM

To: Brown Oil and Gas LLC

Subject: Re: COGCC Form 2A review of Brown Oil & Gas' Casement 2 location - Doc #401537500

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

To: Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>

Tue, Apr 17, 2018 at 2:08 PM

Courtney,

Does the COGCC refer to drilling fluids and cuttings as being the same as mud disposal? - Yes and No. We are talking about drilling mud, but we have split out mud disposal into drilling fluid disposal and drill cutting disposal. Its not uncommon for many operators to now separate them out as part of their drilling operations and dispose of them separately and in differing manners. It was getting difficult for us to track the various disposal methods when it was being lumped together as just mud disposal.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Apr 23, 2018 at 12:22 PM

Mr. Andrews,

When I researched the 900 rule series as per your prior email, rule 907.d. lists drilling fluids, would this also apply to drilling cuttings. I am interested in rule 907.d(3A). the drying and burial in pits as an option for us.

Also I have four new pictures to upload of the rangeland currently present on the Casement 2, is there a specific way I can upload them to the form. I tried but because the status of the document is, " On Hold " it would not allow me to.

Thanks,

Courtney Brown

Roberta Brown

Brown Oil & Gas LLC
Brown Oilfield Services LLC
10481 CR 20.5
Sterling, CO 80751
970/522-1072 Phone
970/521-0187 Fax

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

Sent: Tuesday, April 17, 2018 2:08 PM

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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>

Mon, Apr 23, 2018 at 1:30 PM

Courtney,

For single vertical wells, Rule 907.d. does apply to both drilling fluids and cuttings; therefore, Rule 907.d.(3)A about drying and burial in pits on non-crop land is available to you. You have indicated on the Form 2A that neither salt based nor oil based drilling fluids will be used. This is good as the use of them makes it more difficult to meet our Table 910-1 standards which is a requirement of this Rule. If dry and burial is what you'd like to do I can change the drilling fluids disposal from Land application to Evaporation and the cuttings disposal to Drilling Pit. Please let me know if that is acceptable. If so I will also add a Condition of Approval (COA) requiring that following the drying part, you collect a sample of the drill cuttings and have them laboratory analyzed to determine if they meet our Table 910-1 standards. This next part won't be a requirement of the COA but it would also be a good idea that after the drilling pit is dug, but before it is used to hold the drilling fluids and cuttings, a background sample is collected of the soil at the bottom of the pit. Its not uncommon for the native soil in certain parts of Colorado to naturally have background concentrations that exceed some of our Table 910-1 standards (arsenic for example). This background sample has proven very useful for operators and the COGCC when a concern with soil contamination from drilling fluids and cuttings disposal has arisen.

Once a permit is submitted to us for review, you are unable to make any changes or additions to it. Please send me these pictures and I will attach them for you. Please don't send me the JPEGs straight out of the camera. They need to be saved as a single PDF document with the name of the location (Casement 2) and the date they were taken visible on the document.

Please feel free to contact me with any additional questions you have.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado




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Brown Oil and Gas LLC <brown_oil_and_gas@hotmail.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Apr 24, 2018 at 12:14 PM

Brown Oil and Gas LLC has shared a OneDrive file with you. To view it, click the link below.

 Casement 2 (rangeland).pdf

Once again thank you for helping me understand this form, and answering all of our questions. We would like to go ahead with the dry and burial. Please change the drilling fluids disposal to evaporation and the cuttings disposal to drilling pit. I also have attached the PDF document for the images that you have requested.

Courtney Brown

Roberta Brown

Brown Oil & Gas LLC
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970/521-0187 Fax

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

Sent: Monday, April 23, 2018 1:30 PM

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