

RE: Livingston doc no 401477008

14 messages

Blane Thingelstad <BThingelstad@extractionog.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>
Cc: "Noto - DNR, John" <john.noto@state.co.us>

Tue, May 29, 2018 at 10:25 AM

Rebecca, John,

If the COGCC would like that for a BMP, Extraction is agreeable as it matches the Broomfield operator agreement.

BMP for gas monitors during flowback:

Autonomous 4 gas monitors will be placed around the location during the flowback phase.

Distance from Livingston pad disturbed area to the edge of the proposed reservoir is ~400'.

Fencing BMP:

Site security will be maintained at all times. Location will be adequately fenced to restrict access by unauthorized persons. The site will have gated access to keep unauthorized vehicles out and fencing will be placed around all production equipment.

Anchoring BMP:

All new well equipment will be secured to the extent necessary to resist flotation collapse, lateral movement, or subsidence.

Thanks,

Blane

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>
Sent: Friday, May 25, 2018 1:26 PM
To: Blane Thingelstad <BThingelstad@ExtractionOG.com>
Subject: Re: Livingston doc no 401477008

And another: After reviewing BMP #56 from the MOU, COGCC is willing to add the following to the 2A with your concurrence:

Automatic Safety Protective Systems and Surface Safety Valve. An automated safety system, governed by safety devices and a programmable logic computer, will be installed at the Well Sites. The automated safety system shall include the installation, monitoring and remote control of a Surface Safety Valve ("SSV") among many other engineered measures and devices that are implemented to greatly reduce or eliminate the potential for a well event. All New Wells will have a SSV installed prior to the commencement of the Production Phase connected to the production tubing at the surface. The SSV will be equipped to operate remotely via the automated safety protective system, which monitors multiple flowing pressures and rates which have predetermined maximum and/or minimum threshold values programmed and will remotely shut the well in should certain upset conditions be detected. Additionally, the automated safety system provides the ability to remotely shut-in wells on demand through operator remote intervention. The SSV will have documented quarterly testing to ensure functionality. The practice of utilizing automated safety protective systems, including SSV's, exceeds the current State regulations and requirements for wells operated within Colorado.

Thanks,

Rebecca

On Fri, May 25, 2018 at 1:05 PM, Treitz - DNR, Rebecca <rebecca.treitz@state.co.us> wrote:

Blane,

From our conversation today, I wanted to make sure I had the correct letter for the Windsor incident - I have one to Tami dated April 18. Does that sound correct?

Thanks,

Rebecca

On Fri, May 25, 2018 at 6:21 AM, Blane Thingelstad <BThingelstad@extractionog.com> wrote:

Rebecca,

Please find answers and conformations of questions below and attached.

4. On October 24, 2017 Extraction Oil & Gas, Inc. ("Extraction") and the City and County of Broomfield ("Broomfield") entered into an Operator Agreement that described Extraction's planned development. Among Extraction's and Broomfield's commitments included in the Operator Agreement was a list of fifty-seven Best Management Practices (BMPs) which Extraction was planning to implement in its project to mitigate any impacts. In the Operator Agreement, Extraction committed to including these BMPs on its Form 2A submittal to the Commission even if the proposed BMPs exceeded COGCC jurisdiction and it in fact did include them in Extraction's initial draft. However, many of these BMPs exceeded the scope of the Commission, therefore, the Commission requested that several BMPs be revised. The BMPs were revised in collaboration with the Commission and engagement with the City and County of Broomfield.

Extraction would like to attach the Exhibit B to the Operator Agreement to the Form 2A as reference and as part of Extraction's commitment to implement the BMPs in the Operator Agreement for the Broomfield Project.

Thank you,

Blane

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Sent: Wednesday, May 23, 2018 2:53 P

To: Blane Thingelstad <BThingelstad@ExtractionOG.com>; Bonnie Lamond <blamond@extractionog.com>

Subject: Livingston doc no 401477008

Blane,

COGCC is reviewing the Form 2A for Extraction's Livingston location (doc no 401477008). Based on our review and previous correspondence and with your concurrence, the following changes will be made to the Form 2A. Please provide additional information as necessary:

1. Added related remote production for the centralized gathering facility in Weld County, draft 2A doc no 401606738 and 401606721.

a. [Correct.](#)

2. The water resource section should be a sensitive area based on distance to surface water on the location. The stormwater management/construction drawings are attached as doc no 2316334.

a. [Ok](#)

3. The depth to groundwater is at approximately 30 feet instead of 630 feet based on water well 128950.

4. The Best Management Practices have been changed based on correspondence between Extraction, City of Broomfield, and COGCC. Please provide a statement referencing the MOU with Broomfield and Exhibit B to add as an attachment to the 2A.

5. The land use is rangeland. A Condition of Approval for reference area photos of the 2018 growing season are to be provided via a Form 4 Sundry prior to November 1, 2018.

a. [Ok, Corrected photos also attached.](#)

6. Please provide a BMP for containment of flow lines.

a. [By request of the City and County of Broomfield, Extraction agrees to test pressure test flowlines according to the COGCC flowline rules bi-annually.](#)

7. Please provide construction layout drawings for the location.

a. [Attached](#)

Please let me know if you have any questions or would like to discuss any of the above further.

Thank you,

Rebecca

--

Rebecca Treitz

Oil and Gas Location Assessment Specialist

P 303.894.2100 x5173 | F 303.894.2109 |

[1120 Lincoln Street, Suite 801, Denver, CO 80203](#)Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

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Noto - DNR, John <john.noto@state.co.us>
To: Blane Thingelstad <BThingelstad@extractionog.com>
Cc: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Wed, May 30, 2018 at 9:21 AM

Thanks Blane,

We will add the BMP to the Livingston 2A.

John
[Quoted text hidden]

--

John Noto P.G.

Oil and Gas Location Assessment Supervisor



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894-2100 ext 5182

[1120 Lincoln Street, Suite 801, Denver, CO 80203](#)john.noto@state.co.us | www.colorado.gov/cogcc

Blane Thingelstad <BThingelstad@extractionog.com>

Thu, May 31, 2018 at 10:32 AM

To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>, Bonnie Lamond <blamond@extractionog.com>

Cc: Chandler Newhall <cnewhall@extractionog.com>, Ghislaine Bruner <GBruner@polsinelli.com>, "Noto - DNR, John" <john.noto@state.co.us>

Rebecca, John,

Below is a list of additional BMP's to follow up from our meeting last Friday.

- A BMP regarding more specifics on the fencing or access restriction to the location
 - Site security will be maintained at all times. Location will be adequately fenced to restrict access by unauthorized persons. The site will have gated access to keep unauthorized vehicles out and fencing will be placed around all production equipment.
- Revise the BMP regarding anchoring of equipment on the location
 - All new well equipment will be secured to the extent necessary to resist flotation collapse, lateral movement, or subsidence.
- A BMP for flowline bi-annual testing to revise "slurry" BMP
 - Containment Berms. The Operator shall utilize steel-rim berms around all separators at the Well Site with sufficient capacity to contain 1.5 times the maximum volume of all liquids that will be contained at a facility at any given time plus sufficient freeboard to prevent overflow. All berms and containment devices shall be inspected quarterly by the Operator and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel or such sources are rated in accordance with industry codes and standards. Secondary containment such as duck ponds or lined earthen berms for temporary tanks shall also be used. In addition to tankless and secondary containment around surface vessels.
 - Permanent containment berms shall be constructed of steel rings, designed and installed to prevent leakage and resist degradation from erosion or routine operation.
 - Secondary containment for separators shall be constructed with a synthetic or engineered liner that contains all primary containment vessels and is mechanically connected to the steel ring to prevent leakage.
 - By request of the City and County of Broomfield, Extraction agrees to test pressure test flowlines according to the COGCC flowline rules bi-annually.
- A BMP for monitoring of the location during flowback operations
 - Flowback Monitoring System: Autonomous 4 gas monitors will be placed around the location during the flowback phase.
- Revise sentence for the "Attached stormwater plan" to be attached stormwater BMP drawings.
 - Updated BMP: Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Co-locate flowlines and/or gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any gathering lines. Location will be covered under Extraction Oil & Gas's field wide permit, permit number COR03M013. Typical stormwater BMPs installed include a diversion ditch and berm with sediment traps and installation of wattles where necessary. Please see the attached Stormwater BMP drawings.

From: Blane Thingelstad

Sent: Tuesday, May 29, 2018 8:39 AM

To: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>; Bonnie Lamond <blamond@extractionog.com>

Cc: Chandler Newhall <cnewhall@extractionog.com>; Ghislaine Bruner <GBruner@Polsinelli.com>

Subject: RE: Livingston doc no 401477008

Rebecca,

Please find Extraction response to public comments.

From: Blane Thingelstad

Sent: Friday, May 25, 2018 6:21 AM

To: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>; Bonnie Lamond <blamond@extractionog.com>

Cc: Chandler Newhall <cnewhall@extractionog.com>; Ghislaine Bruner <GBruner@Polsinelli.com>

Subject: RE: Livingston doc no 401477008

Rebecca,

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Extraction would like to attach the Exhibit B to the Operator Agreement to the Form 2A as reference and as part of Extraction's commitment to implement the BMPs in the Operator Agreement for the Broomfield Project.

Thank you,

Blane

From: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Sent: Wednesday, May 23, 2018 2:53 P

To: Blane Thingelstad <BThingelstad@ExtractionOG.com>; Bonnie Lamond <blamond@extractionog.com>

Subject: Livingston doc no 401477008

Blane,

COGCC is reviewing the Form 2A for Extraction's Livingston location (doc no 401477008). Based on our review and previous correspondence and with your concurrence, the following changes will be made to the Form 2A. Please provide additional information as necessary:

1. Added related remote production for the centralized gathering facility in Weld County, draft 2A doc no 401606738 and 401606721.
a. [Correct.](#)

2. The water resource section should be a sensitive area based on distance to surface water on the location. The stormwater management/construction drawings are attached as doc no 2316334.
a. [Ok](#)

3. The depth to groundwater is at approximately 30 feet instead of 630 feet based on water well 128950.

4. The Best Management Practices have been changed based on correspondence between Extraction, City of Broomfield, and COGCC. Please provide a statement referencing the MOU with Broomfield and Exhibit B to add as an attachment to the 2A.

5. The land use is rangeland. A Condition of Approval for reference area photos of the 2018 growing season are to be provided via a Form 4 Sundry prior to November 1, 2018.
a. [Ok, Corrected photos also attached.](#)

6. Please provide a BMP for containment of flow lines.

a. [By request of the City and County of Broomfield, Extraction agrees to test pressure test flowlines according to the COGCC flowline rules bi-annually.](#)

7. Please provide construction layout drawings for the location.

a. [Attached](#)

Please let me know if you have any questions or would like to discuss any of the above further.

Thank you,

Rebecca

--

Rebecca Treitz

Oil and Gas Location Assessment Specialist

P 303.894.2100 x5173 | F 303.894.2109 |

1120 Lincoln Street, Suite 801, Denver, CO 80203

Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc

Noto - DNR, John <john.noto@state.co.us>

To: Blane Thingelstad <BThingelstad@extractionog.com>

Cc: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>, Bonnie Lamond <blamond@extractionog.com>, Chandler Newhall <cnewhall@extractionog.com>, Ghislaine Bruner <GBruner@polsinelli.com>

Thu, May 31, 2018 at 10:34 AM

Thanks Blane.
[Quoted text hidden]
--

John Noto P.G.

Oil and Gas Location Assessment Supervisor



P 303.894-2100 ext 5182

1120 Lincoln Street, Suite 801, Denver, CO 80203

john.noto@state.co.us | www.colorado.gov/cogcc

Blane Thingelstad <BThingelstad@extractionog.com>

Thu, May 31, 2018 at 4:37 PM

To: "Noto - DNR, John" <john.noto@state.co.us>

Cc: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>, Bonnie Lamond <blamond@extractionog.com>, Chandler Newhall <cnewhall@extractionog.com>, Ghislaine Bruner <GBruner@polsinelli.com>

John,

I apologize for a version control issues. Attached are the Extraction response to public comment with references to the BMP numbers removed, revised 5/25/2018.

Thanks,

Blane

From: Noto - DNR, John <john.noto@state.co.us>

Sent: Thursday, May 31, 2018 10:35 AM

To: Blane Thingelstad <BThingelstad@ExtractionOG.com>

Cc: Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>; Bonnie Lamond <blamond@extractionog.com>; Chandler Newhall <cnewhall@extractionog.com>; Ghislaine Bruner <GBruner@polsinelli.com>

Subject: Re: Livingston doc no 401477008

Thanks Blane.

On Thu, May 31, 2018 at 10:32 AM, Blane Thingelstad <BThingelstad@extractionog.com> wrote:

Rebecca, John,

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[Quoted text hidden]
[Quoted text hidden]

a. Correct.

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a. Ok

3. The depth to groundwater is at approximately 30 feet instead of 630 feet based on water well 128950.

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a. Ok, Corrected photos also attached.

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a. Attached

Please let me know if you have any questions or would like to discuss any of the above further.

Thank you,

Rebecca

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Rebecca Treitz

Oil and Gas Location Assessment Specialist

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Rebecca.Treitz@state.co.us | www.colorado.gov/cogcc



John Noto P.G.

Oil and Gas Location Assessment Supervisor

6/1/2018

State.co.us Executive Branch Mail - RE: Livingston doc no 401477008

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Broomfield Response to Public Comments 5-25-18 update.pdf
93K

Noto - DNR, John <john.noto@state.co.us>

Thu, May 31, 2018 at 4:42 PM

To: Blane Thingelstad <BThingelstad@extractionog.com>

Cc: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>, Bonnie Lamond <blamond@extractionog.com>, Chandler Newhall <cnewhall@extractionog.com>, Ghislaine Bruner <GBruner@polsinelli.com>

Blane,

Thanks for the updated document.

John
[Quoted text hidden]

Noto - DNR, John <john.noto@state.co.us>

Fri, Jun 1, 2018 at 8:11 AM

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

Doug,

Please replace the existing comment response document attached to Form 2A #401477008 with this one. Thanks.

John

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

From: **Blane Thingelstad** <BThingelstad@extractionog.com>

Date: Thu, May 31, 2018 at 4:37 PM

Subject: RE: Livingston doc no 401477008

[Quoted text hidden]
[Quoted text hidden]



Broomfield Response to Public Comments 5-25-18 update.pdf
93K

Noto - DNR, John <john.noto@state.co.us>

Fri, Jun 1, 2018 at 8:37 AM

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

The doc # to replace is 2316335
[Quoted text hidden]