



STATE OF
COLORADO

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

Jodster South 24-25HZ - Doc [#401779724]

4 messages

Piekara, John <John.Piekara@anadarko.com>

Thu, Dec 6, 2018 at 10:09 AM

To: "doug.andrews@state.co.us" <doug.andrews@state.co.us>

Cc: "Schindler, Lisa" <Lisa.Schindler@anadarko.com>

Hello Doug.

Thank you for the opportunity to provide an updated facility drawing (attached) and provide clarification regarding the temporary tanks at this location. Please see the cultural distance from the permanent facilities and temporary tanks listed below.

Cultural Feature	Distance from permanent facilities (ft)	Distance from temporary facilities (ft)	Closest distance (ft)
Building	574	388	388
Building Unit	1118	983	983
High Occupancy Building Unit	5280	5280	5280
Designated Outside Activity Area	5280	5280	5280
Public Road	939	805	805
Above Ground Utility	980	844	844
Railroad	5280	5280	5280
Property Line	78	47	47

It is KMG's intent to initially utilize 52 temporary 500bbl tanks at this location for flowback and initial production. Temporary tanks will be on location for an estimated 6 – 9 months with tanks being removed incrementally as the volume of produced water declines.

BMPs:

- Material Handling and Spill Prevention – The temporary water tanks will be staged on a liner to prevent incidental spills from reaching the ground surface.
- Emissions mitigation – Six temporary ECDs will be utilized while the temporary tanks are present to control emissions.

Siting Rationale:

- The placement of the 52 temporary 500bbl produced water tanks are within 1,000' from a building unit. These tanks are not permanent facilities and will be removed incrementally from location as produced water declines. Utilizing the temporary tanks was chosen as an option for shorter term disturbance versus placing and removing larger more permanent water storage tanks. The maximum time any temporary tank is expected to be on location is estimated to be 6 – 9 months. The placement of these temporary tanks is further from a building unit than the planned Jodster South wells. The location of these tanks allows the most efficient removal of produced water and tanks as they are no longer necessary. Permanent facilities are located greater than 1,000' from a building unit.

Please let me know if you need further information or if you have any other questions.

Regards,

John

John Piekara

Sr. Regulatory Analyst

Anadarko Petroleum Corporation

1099 18th Street | Suite 1800

Denver, CO 80202

Office – 720-929-3094

Cell – 717-609-2023

 **JODSTER FACILITY DRAWING.pdf**
5817K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: John.Piekara@anadarko.com, djregulatory@anadarko.com
Cc: Lisa.Schindler@anadarko.com

Mon, Dec 10, 2018 at 10:02 AM

John,

Thank you for the updated Facility Layout Drawing and the additional information concerning the temporary tanks. I have completed the technical review of this Form 2A and do have a few more questions.

1) The Noise mitigation BMP appears to be taken from a Form 2A for another location. I say this because it includes the following statement *"... sound mitigation barriers (straw bales) will be placed along the north side of the pad location to dampen noise and minimize impact to the nearby residences and to Weld County Road 20 during drilling and completions."* The Jodster South pad is located near the intersection of Weld County Road 13 and 18. Also, while there does appear to be a nearby Building Unit to the north, the closest Building Units to wells and production facilities are to the east and southeast across Weld County Road 13. Please provide me with a revised Noise mitigation BMP that specifically addresses how Kerr McGee will mitigate nuisance noise to all Building Units within the Buffer Zone.

2) The Odor mitigation BMP appears to be taken from a Form 2A for another location. I say this because it includes the following statement **"Additional BMPs for the Ruca 20-5HZ location are: 1) the storage of excess drilling fluid (e.g., fluid not being used in the active mud system) in closed, upright tanks; and 2) the use of an odor neutralizer in the active mud system."** Please provide me with a revised Odor mitigation BMP that specifically addresses how KMG will mitigate nuisance odors on this proposed Oil & Gas Location related to the use of oil based drilling fluids and nuisance odors related to flowback fluids as these are what the COGCC frequently receives odor complaints for.

3) The Multi-Well Plan included on this Form 2A was only for the 12 Jodster South wells. Please provide me the Multi-Well Plan for the 13 Jodster North wells that are also being permitted on this proposed Oil & Gas Location.

4) Now that the Public Comment period has ended, please provide me with a letter certifying Kerr McGee;s compliance with COGCC Rule 306.e. If any meetings/consultation were requested, please also indicate their outcome.

Please respond to this correspondence by January 10, 2019. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

image003.jpg
5K

Schindler, Lisa <Lisa.Schindler@anadarko.com>

Mon, Dec 10, 2018 at 1:29 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, "Piekara, John" <John.Piekara@anadarko.com>, DJ Regulatory <DJRegulatory@anadarko.com>

Hi Doug:

Thanks for reaching out with questions about the 2A application for the Jodster South 24-25HZ pad. John is out of the office today so I am covering for him and will answer your questions to the best of my ability.

I have attached a revised multi-well plan that contains data for both the Jodster North and the Jodster South wells. Would you be able/willing to swap out the previously submitted multi-well plan for the attached version?

I have also reviewed your BMP questions and will attempt to remedy. Please see our revisions below in **RED**, and please let me know if there are any further questions about our 2A application. Per my notation below, we will follow up with the Rule 306.e as soon as possible.

Thanks Doug,

Lisa

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

Sent: Monday, December 10, 2018 10:03 AM

To: Piekara, John <John.Piekara@anadarko.com>; DJ Regulatory <DJRegulatory@anadarko.com>

Cc: Schindler, Lisa <Lisa.Schindler@anadarko.com>

Subject: Re: Jodster South 24-25HZ - Doc [#401779724]

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John,

Thank you for the updated Facility Layout Drawing and the additional information concerning the temporary tanks. I have completed the technical review of this Form 2A and do have a few more questions.

- 1) The Noise mitigation BMP appears to be taken from a Form 2A for another location. I say this because it includes the following statement *"... sound mitigation barriers (straw bales) will be placed along the north side of the pad location to dampen noise and minimize impact to the nearby residences and to Weld County Road 20 during drilling and completions."* The Jodster South pad is located near the intersection of Weld County Road 13 and 18. Also, while there does appear to be a nearby Building Unit to the north, the closest Building Units to wells and production facilities are to the east and southeast across Weld County Road 13. Please provide me with a revised Noise mitigation BMP that specifically addresses how Kerr McGee will mitigate nuisance noise to all Building Units within the Buffer Zone. **Please revise the BMP as follows: sound mitigation barriers (straw bales) will be placed along the east side of the pad location to dampen noise and minimize impact to the nearby residences to the east, northeast and southeast of the pad, and to Larimer County Road 13, during drilling and completions.**
- 2) The Odor mitigation BMP appears to be taken from a Form 2A for another location. I say this because it includes the following statement **"Additional BMPs for the Ruca 20-5HZ location are: 1) the storage of excess drilling fluid (e.g., fluid not being used in the active mud system) in closed, upright tanks; and 2) the use of an odor neutralizer in the active mud system."** Please provide me with a revised Odor mitigation BMP that specifically addresses how KMG will mitigate nuisance odors on this proposed Oil & Gas Location related to the use of oil based drilling fluids and nuisance odors related to flowback fluids as these are what the COGCC frequently receives odor complaints for. **Please revise the BMP as follows: Additional BMPs for the Jodster South 24-25HZ location are: 1) the storage of excess drilling fluid (e.g., fluid not being used in the active mud system) in closed, upright tanks; and 2) the use of an odor neutralizer in the active mud system.**
- 3) The Multi-Well Plan included on this Form 2A was only for the 12 Jodster South wells. Please provide me the Multi-Well Plan for the 13 Jodster North wells that are also being permitted on this proposed Oil & Gas Location. **Revised multi-well plan attached.**
- 4) Now that the Public Comment period has ended, please provide me with a letter certifying Kerr McGee;s compliance with COGCC Rule 306.e. If any meetings/consultation were requested, please also indicate their outcome. **We are compiling the Rule 306.e letter and will send along ASAP.**

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JODSTER NORTH 8-25HZ_MULTI-WELL PLAN_ALL WELLS.pdf



Schindler, Lisa <Lisa.Schindler@anadarko.com>

Tue, Dec 11, 2018 at 8:06 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, "Piekara, John" <John.Piekara@anadarko.com>, DJ Regulatory <DJRegulatory@anadarko.com>

Good morning Doug:

On behalf of John Piekara, attached please find the Rule 306.e certification letter for the subject pad. Please let me know if you have any further questions, and thanks for your help with this 2A review.

From: Schindler, Lisa

Sent: Monday, December 10, 2018 1:30 PM

To: Andrews - DNR, Doug <doug.andrews@state.co.us>; Piekara, John <John.Piekara@anadarko.com>; DJ Regulatory <DJRegulatory@anadarko.com>

Subject: RE: Jodster South 24-25HZ - Doc [#401779724]

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