

FORM  
2A

Rev  
06/19

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401943016

Date Received:

02/20/2019

Oil and Gas Location Assessment

☐ New Location ☐ Refile ☒ Amend Existing Location Location#: 314168

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

**314168**

Expiration Date:

**07/07/2022**

☒ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 100321

Name: ROCKY MTN NATURAL GAS LLC ADBA BLACK HILLS ENERGY

Address: 1515 WYNKOOP STREET #500

City: DENVER State: CO Zip: 80202

Contact Information

Name: Mark Arnold

Phone: (720) 899-6965

Fax: ( )

email: Mark.Arnold@blackhillscorp.com

FINANCIAL ASSURANCE

☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20070072 ☐ Gas Facility Surety ID (Rule 711): \_\_\_\_\_

☐ Waste Management Surety ID (Rule 704): \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Wolf Creek Unit Number: 9

County: PITKIN

QuarterQuarter: NESW Section: 36 Township: 8S Range: 90W Meridian: 6 Ground Elevation: 10163

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 1638 feet FSL from North or South section line

1016 feet FWL from East or West section line

Latitude: 39.312831 Longitude: -107.395531

PDOP Reading: 1.7 Date of Measurement: 08/20/2018

Instrument Operator's Name: Lauren Vance

LOCAL GOVERNMENT INFORMATION

County: PITKIN Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this COGCC application? If the local government has waived its right to precede the COGCC in siting determination, indicate by selecting "NO" here and selecting "Waived" below.

☒ Yes ☐ No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location. ☒

The local government siting permit type is: LAND USE APPLICATION

The local government siting permit was filed on: 02/13/2019

The disposition of the application filed with the local government is: Approved

Additional explanation of local process:

Operator received the following statement from the Pitkin County LGD on June 14, 2019: "As we received no formal public objections or direction from BOCC for further consideration of the FONSI decision during the required 21 day period set forth in the Pitkin County Land Use Code, the FONSI decision regarding the replacement of Black Hills Natural Gas Storage Wells #9D-2 and #9D-3 in the Wolf Creek Storage Unit is effective as of today, June 14, 2019."

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

**This proposed Oil and Gas Location is:** LOCATION ID # FORM 2A DOC #



## FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells <u>2</u>	Oil Tanks* <u>      </u>	Condensate Tanks* <u>      </u>	Water Tanks* <u>2</u>	Buried Produced Water Vaults* <u>      </u>
Drilling Pits <u>      </u>	Production Pits* <u>      </u>	Special Purpose Pits <u>      </u>	Multi-Well Pits* <u>      </u>	Modular Large Volume Tanks <u>      </u>
Pump Jacks <u>      </u>	Separators* <u>      </u>	Injection Pumps* <u>      </u>	Cavity Pumps* <u>      </u>	Gas Compressors* <u>      </u>
Gas or Diesel Motors* <u>      </u>	Electric Motors <u>      </u>	Electric Generators* <u>      </u>	Fuel Tanks* <u>      </u>	LACT Unit* <u>      </u>
Dehydrator Units* <u>2</u>	Vapor Recovery Unit* <u>      </u>	VOC Combustor* <u>      </u>	Flare* <u>      </u>	Pigging Station* <u>      </u>

## OTHER FACILITIES\*

<u>Other Facility Type</u>	<u>Number</u>
----------------------------	---------------

<input type="text"/>	<input type="text"/>
----------------------	----------------------

\*Those facilities indicated by an asterisk (\*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

Natural gas pipelines are already buried in place. No new lines are anticipated for this location.

## CONSTRUCTION

Date planned to commence construction: 07/01/2019 Size of disturbed area during construction in acres: 0.76  
Estimated date that interim reclamation will begin: 06/01/2020 Size of location after interim reclamation in acres: 0.76  
Estimated post-construction ground elevation: 10163

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?

Reuse Facility ID:  or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: US Forest Service

Phone: 970-945-2521

Address: 900 Grand Ave.

Fax:

Address:

Email:

City: Glenwood Springs State: CO Zip: 81601

Surface Owner: ☐ Fee ☐ State ☒ Federal ☐ Indian

Check all that apply. The Surface Owner: ☒ is the mineral owner

☒ is committed to an oil and Gas Lease

☒ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☐ Fee ☐ State ☒ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No

The right to construct this Oil and Gas Location is granted by: oil and gas lease

Surface damage assurance if no agreement is in place:  Surface Surety ID:

Date of Rule 306 surface owner consultation

## CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☐ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☒ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe):

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

**Future Land Use (Check all that apply):**

Crop Land: ☐ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP  
 Non-Crop Land: ☒ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): \_\_\_\_\_  
 Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

**CULTURAL DISTANCE INFORMATION**

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	5280 Feet	5280 Feet
Building Unit:	5280 Feet	5280 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	1662 Feet	1662 Feet
Above Ground Utility:	5280 Feet	5280 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	5280 Feet	5280 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 Feet

**INSTRUCTIONS:**

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.  
 - Enter 5280 for distance greater than 1 mile.  
 - Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.  
 - Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.  
 - For measurement purposes only, Production Facilities should only include those items with an asterisk(\*) on the Facilities Tab.

**SCHOOL SETBACK INFORMATION**

Was Notice required under Rule 305.a.(4)? ☐ Yes ☒ No

**DESIGNATED SETBACK LOCATION INFORMATION**

Check all that apply. This location is within a:

- ☐ Buffer Zone  
☐ Exception Zone  
☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.  
 - Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.  
 - Urban Mitigation Area - as defined in 100-Series Rules.  
 - Large UMA Facility – as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: \_\_\_\_\_

**FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:**

- ☐ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (onll or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- ☐ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

## SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

NRCS Map Unit Name: \_\_\_\_\_

## PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☒

Plant species from: ☐ NRCS or, ☐ field observation Date of observation: \_\_\_\_\_

List individual species: \_\_\_\_\_

### Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- ☐ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- ☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- ☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- ☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- ☒ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- ☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- ☐ Alpine (above timberline)
- ☐ Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area: ☒ No ☐ Yes

Distance to nearest

downgradient surface water feature: 4314 Feet

water well: 905 Feet

Estimated depth to ground water at Oil and Gas Location 50 Feet

Basis for depth to groundwater and sensitive area determination:

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

Is the Location within a Floodplain? ☒ No ☐ Yes Floodplain Data Sources Reviewed (check all that apply)

☒ Federal (FEMA)

☐ State

☐ County

☐ Local

☐ Other

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 609

## WILDLIFE

☐ This location is included in a Wildlife Mitigation Plan

☐ This location was subject to a pre-consultation meeting with CPW held on \_\_\_\_\_

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

☐ Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area

☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)

☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)

☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)

☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

## RULE 502.b VARIANCE REQUEST

☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

**OPERATOR COMMENTS AND SUBMITTAL**


Described. A small amount of additional disturbance, approximately 0.012 acres, will be added to the existing pad to accommodate the additional well and drilling rig. The pad is already at a minimal size for production pad; no interim reclamation is planned to occur.

Two wells are proposed to be drilled from this location. The existing well has been plugged and abandoned.

Production facilities have not been designed yet for this location.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.  
 Signed: \_\_\_\_\_ Date: 02/20/2019 Email: Jessicadonahue@summiteng.net  
 Print Name: Jessica Donahue Title: Regulatory Supervisor

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved:  Director of COGCC Date: 7/8/2019

**Conditions Of Approval**

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type	Description
	Planning: The following conditions of approval (COAs) will apply: •Provide Notices as described in the most current version of the Northwest Notification Policy. •Operator shall provide a Reference Area Map and four (4) color photographs of the Reference Area, taken during the growing season of vegetation and facing each cardinal direction (each photograph shall be identified by date taken, well or oil and gas location name, and direction of view); and submitted within twelve (12) months of the Form 2A permit approval.
	Drilling/Completions: The following conditions of approval (COAs) will apply: •As indicated on the Form 2A and associated Form 2s, a closed loop system must be implemented during drilling. •The moisture content of all cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. •The trucks used for offsite disposal of WBM-generated drill cuttings shall implement measures (covers, misting, etc.) to reduce dust and PM emissions during transport from the well site to the commercial disposal facility.

**Best Management Practices**

No	BMP/COA Type	Description
1	Traffic control	Operator will be implementing a traffic control plan and road closures to limit unauthorized access during mobilization, construction, drilling, completions, and demobilization operations.
2	Drilling/Completion Operations	During the drilling process, the cuttings will be brought to the surface and stabilized by dewatering them via shaker tables, and then placed in a steel open top flat tank under the cuttings discharge chute with one end open to allow a front loader to scoop out cuttings after they have gone through the shakers and press. Once the cuttings are dewatered, they will be temporarily stored in a three-sided steel bin (the open side being higher than the closed end) prior to offsite disposal.
3	Drilling/Completion Operations	A closed loop system will be used. No pits will be built. An enclosed flare stack will be used only during the drilling and completion process. During flowback operations, all gas and fluids will be sent from the well being flowbacked to the other well on location. No flare or VOC combustor is required as the storage operations are a closed system. Two dehydrator units are onsite to separate any produced water from wells during transfer operations.

Total: 3 comment(s)

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2108814	ACCESS ROAD MAP
2108815	LOCATION PICTURES
2108816	HYDROLOGY MAP
2108817	RIG LAYOUT DRAWING
2108818	LOCATION DRAWING
2108819	FACILITY LAYOUT DRAWING
2108820	MULTI-WELL PLAN
2108821	WOLF CREEK STORAGE UNIT WELL VICINITY MAP
2108822	WOLF CREEK STORAGE UNIT HAUL ROUTE MAP
2108823	WOLF CREEK STORAGE UNIT PROJECT INFORMATION
2108826	CORRESPONDENCE
2108827	CORRESPONDENCE
2108845	APPROVED (5-24-19) BLM FEDERAL APD, WOLF CREEK UNIT 9-D2
2108846	APPROVED (5-24-19) BLM FEDERAL APD, WOLF CREEK UNIT 9-D3
2108847	FOREST SERVICE DECISION MEMO (6-17-19), WOLF CREEK STORAGE WELLS
2108848	APPROVED (6-14-19) PITKIN COUNTY PERMIT, WOLF CREEK STORAGE WELLS
2108851	COGCC AND PITKIN COUNTY CORRESPONDENCE
401943016	FORM 2A SUBMITTED
401943082	CONST. LAYOUT DRAWINGS

Total Attach: 19 Files

## General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	-Added the plugging and abandonment bond surety ID number -Checked surface owner is committed to oil and gas lease and has signed oil and gas lease -Corrections made with operator concurrence -Permit Final review complete	07/02/2019
Permit	Final Review Completed.	06/21/2019
OGLA	06/19/2019 - COGCC staff conducted its technical review of the Wolf Creek Unit 9 Pad Form 2A (Form 2A #401943016) within the context of SB 19-181 and the required Director Objective Criteria. This Form 2A permit application did not meet any of the Director Objective Criteria and is compliant with all applicable COGCC rules.	06/19/2019
Permit	COGCC Staff has added the Local Government siting permit information and the School and Childcare Center distances provided by the operator.	06/17/2019



OGLA	<p>03/07/2019 - location does not fall within 'Sensitive Wildlife Habitat (SWH)' or 'Restricted Surface Occupancy (RSO)' areas based on CPW maps; therefore, no CPW Wildlife Consultation is required; initiated OGL</p> <p>03/07/2019 - initiated OGLA Form 2A review by Dave Kubeczko; placed Northwest Notification Policy notification and MLVT COAs on the Form 2A; requested additional drawings from operator;</p> <p>03/08/2019 - received additional drawings from operator;</p> <p>04/12/2019 - LGD and Public Comment periods reopened for 10 days (to 04/22/2019) per a request from Pitkin County; 04/22/2019 - Pitkin County submitted a comment which indicated that the operator had agreed to conduct air and surface water sampling at the location; as this was an 'informational only' comment from the LGD, no COGCC response is required;</p> <p>05/09/2019 - requested additional Federal APD drawings from operator;</p> <p>05/10/2019 - received additional Federal APD drawings from operator;</p> <p>05/14/2019 - completed OGLA Form 2A review by Dave Kubeczko; placed Northwest Notification Policy notification, reference area map and pictures during growing season, closed loop drilling system, and cuttings management COAs on the Form 2A; attached revised drawings to Form 2A;</p> <p>05/14/2019 - passed OGLA Form 2A review by Dave Kubeczko; Northwest Notification Policy notification, reference area map and pictures during growing season, closed loop drilling system, and cuttings management COAs;</p> <p>06/19/2019 - received and attached approved federal APDs (5-24-19), USDA Forest Service Approved Decision Memo (6-17-19), and Pitkin County's approved Permit (6-14-19) from operator; per discussion with operator, revised cuttings disposal from onsite and cuttings trench to offsite and commercial disposal on the Form 2A and associated Form 2s; per operator request, added the following BMPs: site access control (Operator will be implementing a traffic control plan and road closures to limit unauthorized access during mobilization, construction, drilling, completions, and demobilization operations.); drilling and completions (A closed loop system will be used. No pits will be built. An enclosed flare stack will be used only during the drilling and completion process. During flowback operations, all gas and fluids will be sent from the well being flowbacked to the other well on location. No flare or VOC combustor is required as the storage operations are a closed system. Two dehydrator units are onsite to separate any produced water from wells during transfer operations.), and drill cuttings management (During the drilling process, the cuttings will be brought to the surface and stabilized by dewatering them via shaker tables, and then placed in a steel open top flat tank under the cuttings discharge chute with one end open to allow a front loader to scoop out cuttings after they have gone through the shakers and press. Once the cuttings are dewatered, they will be temporarily stored in a three-sided steel bin (the open side being higher than the closed end) prior to offsite disposal.); added the following statement to the 'Local Government Information' section: Operator received the following statement from the Pitkin County LGD on June 14, 2019: "As we received no formal public objections or direction from BOCC for further consideration of the FONSI decision during the required 21 day period set forth in the Pitkin County Land Use Code, the FONSI decision regarding the replacement of Black Hills Natural Gas Storage Wells #9D-2 and #9D-3 in the Wolf Creek Storage Unit is effective as of today, June 14, 2019."</p>	05/09/2019
LGD	<p>On March 19, 2019, the Pitkin County Planning and Zoning Commission approved a Location Extent Review for the two new replacement wells proposed by Rocky Mountain Natural Gas on existing well pad #9 in the Wolf Creek Storage Unit.</p> <p>As a condition of approval, the County is requiring the applicant to implement the following sampling and monitoring protocol to address air and water quality as part of the operating procedures. While some refinements may be made prior to commencement of drilling, these standards at a minimum, will be implemented. Our intent in providing this information to COGCC is simply to make you aware of actions we are taking, and to avoid conflicting requirements between agencies to the extent possible. If any of your Staff has questions regarding the following protocol, please contact our Environmental Health Director, Kurt Dahl at 970-920-5438:</p> <p>Regarding Water Sampling:</p> <p>A. The applicant shall follow the Colorado Oil and Gas Conservation Commission Rule 609 for groundwater sampling with the additional requirements:</p> <p>a. An annual sample, not during peak runoff, shall be required after the initial 3 required samples outlined in Rule 609.</p>	04/22/2019

b. Samples shall also include hardness, alkalinity, temperature, dissolved organic carbon, and specific conductance.

c. All analytes required in the baseline sampling shall be included in subsequent samples.

d. Location for sampling shall be determined prior to commencement of work, subject to a site visit with County Environmental Health Dept. Staff to determine the groundwater sampling locations in coordination with the BLM and USFS.

B. Prior to, during, 30-days after completion of the well re-drilling and then on an annual basis (but not during peak runoff), the applicant shall sample surface water at each location for:

a. The analytes listed in COGCC Rule 609

b. Hardness, alkalinity, temperature, dissolved oxygen, dissolve organic carbon, and specific conductance.

c. All analytes required in the baseline sampling shall be included in subsequent samples to provide consistency with baseline data used to establish Gold Medal Waters status on North Thompson Creek.

d. A minimum of 1 sampling location per well

e. Location for sampling shall be determined prior to commencement of work, subject to a site visit with County Environmental Health Dept. Staff to determine the surface water sampling locations in coordination with the BLM and USFS.

Regarding Air Quality Leak Monitoring and Ambient Air Quality Sampling, the applicant shall implement the following standards and protocol as described below:

A. Wells and associated equipment will be subject to U.S. EPA New Source Performance Standard Subpart 0000a - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after September 18, 2015. In accordance with the federal regulation 60.5397a, an inspection and repair plan will be developed and implemented for each well. The leak inspection equipment, leak surveys and leak repairs will be recorded in accordance with Colorado and US EPA record-keeping requirements.

B. Ambient Air Quality samples shall be obtained in accordance with COGCC and/or BLM requirements for well drilling and completion activities. Sampling ambient air quality in subsequent years shall be on an annual basis unless additional sampling is determined to be necessary by Pitkin County. The schedule for additional ambient air quality sampling will be determined by Pitkin County.

1) Grab sample protocol and analyses may be based on Garfield Countys sampling protocol. Pitkin County Public Health/Environmental Health Staff will coordinate with CDPHE or Garfield County and/or Federal Agencies in coordination with RMNG to achieve efficiencies and comprehensive data.

2) There shall be a minimum of one sample per well site.

3) Location of sampling site is to be determined subject to a site visit by County Staff and/or consultants for final location approval, prior to commencement of work on new wells.

General Comments for Air and Water Sampling

A. The written and oral representations of the applicants agents and employees were relied upon in the development of these sampling protocols. The applicant is held to such representations and Pitkin County reserves the right to make changes to these sampling protocols if alternative methods, instruments or technology are determined by Pitkin County to provide more accurate information.

B. All sampling data produced on site shall be shared with Pitkin County within 30 days of sampling.

C. Pitkin County shall be contacted a minimum of 30 days prior to a sampling event to allow the County an opportunity if desired, to attend the sampling event for verification purposes.

D. In the future, Pitkin County reserves the right to ask for an increase in sampling frequency and locations in the air, surface water and/or groundwater based on additional wells being drilled/re-drilled in Pitkin County, and/or contamination/pollution identified.

	<p>Also feel free to contact me with any questions about the Pitkin County Permit review process. Thank you.</p> <p>COGCC RESPONSE: Pitkin County submitted this comment as an 'informational only' comment from the LGD; therefore, no COGCC response is required.</p>	
OGLA	At the request of the LGD, the Director has reopened the public comment period for this Form 2A for 10 days in accordance with Rule 305.d.(3). The public comment period will close 4/22/19.	04/12/2019
Permit	<p>Returned to draft:</p> <p>The captioned form was submitted on or after the effective date (February 14, 2019) of the school setback rules.</p> <p>The form has been updated to include the school data fields.</p> <p>The new fields must be completed prior to resubmitting.</p>	02/22/2019

Total: 8 comment(s)