

STATE OF
COLORADO

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

FW: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Lawrence 7N66W33 1-8 location - Doc #402170112

1 message

Venessa Chase <Venessa.Chase@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Tue, Oct 15, 2019 at 2:38 PM

Hi Doug!

Ally is now on maternity leave until January 6th (she had her baby yesterday ☺). Can you please forward all future inquiries to me? Also, if there are any other outstanding issues you were waiting on her for I'd gladly get you the answers.

Please see comments below for this location.

Venessa Chase | Regulatory Supervisor (Wattenberg) | PDC Energy |

O: 303-318-6102 | C: 303-907-1714 | venessa.chase@pdce.com

From: Ally Ota <Alexandria.Ota@pdce.com>
Sent: Sunday, October 13, 2019 11:48 AM
To: Venessa Chase <Venessa.Chase@pdce.com>
Subject: FW: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Lawrence 7N66W33 1-8 location - Doc #402170112

Ally Ota | Regulatory Technician | PDC Energy, Inc. | O: 303-831-3931 | C: 435-671-7477

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Friday, October 11, 2019 9:54 AM
To: Ally Ota <Alexandria.Ota@pdce.com>
Subject: [EXTERNAL] :COGCC Form 2A review of PDC Energy's Lawrence 7N66W33 1-8 location - Doc #402170112

Ally,

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

1) In the Drilling Waste Management Program section the drilling fluid and cuttings disposal methods were left blank. I would like to indicate the disposal method for the oil based drilling fluid and cuttings which would be Commercial Disposal. Please let me know if that is acceptable. [Agreed](#)

2) For the Right to Construct questions, PDC Energy has indicated it is granted by an oil and gas lease. As PDC Energy also has a Surface Use Agreement and this location is in unincorporated Weld County, I would like to change the Right to Construct to SUA. Please let me know if that is acceptable. [Agreed](#)

3) PDC Energy has provided a 604.c.(2)D - Access Roads BMP that indicates "[PDC has begun the WOGLA process and will obtain any necessary Access, Right-of-Way, or Traffic Control Permits as deemed necessary by Local Control Government.](#)" As you have indicated that the WOGLA for this location was approved on 8/9/19, I would like to remove this statement from that BMP. [Agreed](#)

4) PDC Energy has provided a Storm Water/Erosion Control BMP that indicates: "[This Stormwater Management Plan contains required elements associated with PDC's construction activities, as defined in the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, Authorization to Discharge Under the Colorado Discharge Permit System \(Permit No. COR-030000, re-issued and effective July 1, 2007\).](#)" No Stormwater Plan was included with this Form 2A. Please revise this BMP to more specifically indicate the types of storm water and erosion control measures that will be taken for this location.

This Stormwater Management Plan meets requirements for construction activities, as defined in the CDPS General Permit for Stormwater Discharges Associated with Construction Activity, Authorization to Discharge Under the Colorado Discharge Permit System (Permit No. COR-030000, re-issued and effective July 1, 2007). BMPs to prevent offsite sediment transport, erosion, and storm water degradation will be implemented through a combination of construction techniques, material selection, re-vegetation, and routine site inspections. BMPs used will include, but not limited to, compacted ditch and berms, sediment basins/traps, check dams, EcoGaurd Bags, erosion control blanket, soil roughing, hydro mulching, entrance track pad and other applicable methods outline in the PDC BMP Manual. BMPs will be installed following sound engineering practices out lined in the Urban Drainage Dictionary.

5) PDC Energy has provided a 604.c.(2)R. Tank Specifications BMP that indicates "[Condensate storage tanks will be designed, constructed and maintained in accordance with National Fire Protection Association \(NFPA\) Code 30 \(2008 version\).](#)" This Rule specifies both crude oil and condensate tanks shall meet this Code. Therefore I would like to add Crude Oil to the beginning of this BMP. [Agreed](#)

6) This proposed Oil & Gas Location meets Objective Criteria 5.c. due to shallow groundwater and proximity to surface water features. Please address potential impacts to this by providing BMPs that discuss remote shutoff and tank level monitoring & flowline integrity testing.

This location will have remote shut-in and remote tank level monitoring capabilities. PDC conducts pressure testing of all flowlines annually.

7) This proposed Oil & Gas Location meets Objective Criteria 5.c. due to shallow groundwater and proximity to surface water features. Therefore I will place the following Condition of Approval on the Form 2A: The location is in a sensitive area due to shallow groundwater, therefore, the operator shall line the secondary containment areas for the tanks and separators with an impervious material. [Agreed](#)

8) Now that the Public Comment period has ended, please provide me with a letter certifying PDC Energy's compliance with Rule 306.e. If any meetings/consultation were requested, please also indicate their outcome. [Attached](#)

Please respond to this correspondence by October 31, 2019. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



303.894.2100 Ext. 5180

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306e Meeting Requirements Certification Letter to Director_NO MEETING_Lawrence 7N66W33 1-8.pdf
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