

FORM  
2A

Rev  
08/19

# 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:

402077978

Date Received:

09/25/2019

## Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: \_\_\_\_\_

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:

**471109**

Expiration Date:

**02/04/2023**

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: 69175

Name: PDC ENERGY INC

Address: 1775 SHERMAN STREET - STE 3000

City: DENVER    State: CO    Zip: 80203

### Contact Information

Name: Ally Ota

Phone: (303) 860-5800

Fax: ( )

email: alexandria.ota@pdce.com

### FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID (Rule 706): 20160047     Gas Facility Surety ID (Rule 711): \_\_\_\_\_
- Waste Management Surety ID (Rule 704): \_\_\_\_\_

### LOCATION IDENTIFICATION

Name: Grays Federal    Number: 5N65W27 1-10

County: WELD

Quarter: SWNW    Section: 27    Township: 5N    Range: 65W    Meridian: 6    Ground Elevation: 4655

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: 1750 feet FNL from North or South section line

333 feet FWL from East or West section line

Latitude: 40.372730    Longitude: -104.657670

PDOP Reading: 1.5    Date of Measurement: 04/01/2019

Instrument Operator's Name: Duncan Hotchkiss

### LOCAL GOVERNMENT INFORMATION

County: WELD    Municipality: N/A



## CONSTRUCTION

Date planned to commence construction: 10/01/2020 Size of disturbed area during construction in acres: 18.50  
Estimated date that interim reclamation will begin: 03/01/2021 Size of location after interim reclamation in acres: 5.40  
Estimated post-construction ground elevation: 4655

## 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? Yes

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Recycle/reuse

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

See Comments

Beneficial reuse or land application plan submitted? Yes

Reuse Facility ID: 461014 or Document Number: \_\_\_\_\_

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

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Michael Boulter Farms

Phone: 970-330-8251

Address: 22019 County Road 54

Fax: \_\_\_\_\_

Address: \_\_\_\_\_

Email: \_\_\_\_\_

City: Greeley State: CO Zip: 80631

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: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

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

Date of Rule 306 surface owner consultation 05/15/2018

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s) below:

190600462

## 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:	357 Feet	429 Feet
Building Unit:	804 Feet	978 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	322 Feet	638 Feet
Above Ground Utility:	305 Feet	620 Feet
Railroad:	3538 Feet	3515 Feet
Property Line:	219 Feet	69 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: 04/11/2019

## 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 (on- 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.

Due to the large amount of building units in this area, the production facility was placed as far away from building units as possible, while still leaving the surface owner the maximum amount of farmeable ground. Please see attached documentation of all reachout between PDC and existing building unit owners. The location could not be moved further east due to Rocky Mountain Midstream installing a compressor site. The existing production facility to the northeast will be removed, and the wells plugged and abandoned, prior to construction of this location.

## 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 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: 32- Kim loam, 1-3% slopes

NRCS Map Unit Name: 21- Dacono clay loam, 0-1% slopes

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: 13 Feet

water well: 350 Feet

Estimated depth to ground water at Oil and Gas Location 13 Feet

Basis for depth to groundwater and sensitive area determination:

Sensitive area determination: Water well within 1,000'. Depth to ground water determination: adjacent parcel water well permit # 13565-R-R. Ditch 13' from western edge of disturbed area.

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 zone: No

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 318A

## 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

Comments	<p>The Grays Federal 1N was used as the reference point for footages and lat/long location.</p> <p>The surface hole will be drilled with water based mud and the production hole will be drilled with oil based mud.</p> <p>Water based drilling fluid and cuttings will be land applied at PDC spread field with COGCC Facility ID 461014. Oil based drilling fluids will be recycled and reused. If disposal is required, the oil based drilling fluids will be disposed at a commercial solid waste disposal facility. Oil based mud drill cuttings for the production hole will be disposed at a permitted commercial solid waste disposal facility.</p> <p>The MLVTs will be onsite for 180 days and contain 53,000 bbls per tank. MLVT manufacturers currently used by PDC are Industrial Systems Inc. (ISI) and PCI Manufacturing.</p> <p>Eight temporary water tanks will be onsite during the initial production phase of the well, estimated time 6-9 months.</p> <p>The Grays Federal 1N and 2N boundary wells will be submitted at a later date when PDC has satisfied the requirements of Rule 318A(e).</p>
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I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: \_\_\_\_\_ Date: 09/25/2019 Email: alexandria.ota@pdce.com

Print Name: Ally Ota Title: Regulatory Tech

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: 2/5/2020

### 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.**

<u>COA Type</u>	<u>Description</u>
Construction	This Form 2A has been approved prior to commission approval of the Drilling and Spacing Unit (DSU) (Docket #190600462) and the Wellbore Spacing Units (WSU). If the final agency action is denial of the DSU and WSU then the operator shall abandon this Oil and Gas Location by submitting a Form 4 Sundry within 45 days of the agency denial; however, if Location construction has commenced, then the Location will be immediately subject to final reclamation.
Drilling/Completion Operations	In the event odors are detected offsite by COGCC Staff during routine inspection, or confirmed offsite by COGCC Staff investigating a complaint, the Director may require the Operator to cease the use of Group I oil based drilling fluid and on the subsequent well the Operator shall switch to Group II oil based drilling fluid combined with the use of an odor neutralizer or switch to Group III oil based drilling fluids (such as NeoFlo or equivalent) prior to initiating future drilling on the well pad.

### Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	General Housekeeping	604c.(2).P. Removal of Surface Trash: A commercial size trash bin for removing debris will be located on site. This bin will be for use by all parties affiliated with the operation and will be emptied upon filling.
2	Storm Water/Erosion Control	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).BMPs for sediment and erosion control will be accomplished through a combination of construction techniques, vegetation and re-vegetation, administrative controls, and structural features.

3	Material Handling and Spill Prevention	604c.(2).G. Berm Construction: Containment berms for Permanent and Temporary Tanks shall be constructed of steel rings with a geosynthetic liner, designed and installed to prevent leakage and resist degradation from erosion or routine operation. Berms and secondary containment will be designed to enclose an area sufficient to contain a minimum of 150% of the largest single tank. Tank batteries are inspected on an annual basis for Spill Prevention, Control and Countermeasure (SPCC) Plan compliance. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Secondary containment at the production facility is typically visually observed by PDC personnel on a daily basis. Any deficiencies are relayed to appropriate PDC staff and a work order is generated to schedule necessary repairs.
4	Material Handling and Spill Prevention	604c.(2).F. Leak Detection Plan: See attached.
5	Material Handling and Spill Prevention	To prevent adverse impacts to shallow groundwater, buried produced water vault shall be installed above an impermeable synthetic or geosynthetic liner system which shall be tied back into the surface liner.
6	Material Handling and Spill Prevention	PDC has opted to use partially buried fiberglass water vaults due to the need for the inlet to the vault being below frost line to keep from creating freezing issues during the cold weather months and prevent environmental releases. As an additional precaution the water vaults are set at 3 to 4 feet below grade keeping 3 to 4 feet of vault above grade with a geo-synthetic liner installed under the vault. The fiberglass vaults that we use are double walled and inspected as part of our integrity testing program. We install our load line at 12 to 18 inches above the bottom of the vault to keep water in the vault at all times as a precaution to keep the vault from floating.
7	Material Handling and Spill Prevention	PDC will implement best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the ditch located approximately 13 feet west of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.

8	Material Handling and Spill Prevention	<p>PDC Energy, Inc. (PDC) has developed Best Management Practices (BMPS) to prevent injuries, property damage or environmental impacts and a Contingency Plan for any Modular Large Volume Tank (MLVT) leak or catastrophic failure of the tank integrity and resulting loss of fluid. These BMPs include, but not limited, by the following:</p> <ol style="list-style-type: none"> <li>1) PDC determines MLVT locations based on size of location, nearby surface waters, site visibility, surrounding land use, property lines, onsite traffic, site security, tear-away tank fill connections, topography (high, low, slope, direction), nearby building units, roads, access points, and surface owner requests.</li> <li>2) Signs shall be posted on each MLVT to indicate that the contents are fresh water and that no E&amp;P waste fluids are allowed. Location and additional signage shall conform to Rule 210.</li> <li>3) MLVTs will be operated with a minimum of 1 foot freeboard at all times.</li> <li>4) Access to the tanks shall be limited to operational personnel.</li> <li>5) Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications. PDC follows manufacturer's Standard Operating Procedures (SOPs) and will provide these SOPs upon request to the COGCC.</li> <li>6) PDC will conduct daily, visual inspections of the exterior wall and general area for any integrity deficiencies before, during, and after filling the MLVTs. PDC uses Construction Sign-Off, Site Preparation Sign-Off, Completion Sign-Off, Pre-Fill, and Site Visit checklists to maintain a written record of inspections. However, when the fluid level in the MLVTs is less than two (2) feet and there is no activity going on (i.e. during holidays or a small break between completions), only intermittent inspections will be conducted. Two feet is the safe volume of fluid level that is needed to hold the liner down and keep the MLVT stable.</li> <li>7) Each location where MLVT's are used will have its own set of unique site-specific characteristics and associated risks (e.g., rural vs. urban setting, grade of the location, etc.) to be considered in a worst case scenario. These characteristics must be identified and addressed prior to the MLVT construction phase and should be documented in the MLVT construction checklist. Ensuring the safety of our employees, contractors, and the public are a top priority. This can be addressed with the implementation of MLVT pre-construction risk assessment measures to address safety concerns, and minimize environmental impacts and property damage in the unlikely event of a MLVT release.</li> <li>8) In the event of a catastrophic MLVT failure, the Operator shall notify the COGCC as soon as practicable but not more than 24 hours after discovery, submit a Form 22-Accident Report within 10 days after discovery, conduct a "root cause analysis", and provide same to COGCC on a Form 4-Sundry Notice within 30 days of the failure.</li> <li>9) The MLVT shall be constructed and operated in accordance with a design package certified and sealed by a Licensed Professional Engineer either in Colorado or the state where the MLVT was designed or manufactured.</li> <li>10) COGCC Rules 605.a.(3,5,6,7, and 8), as applicable to tank setbacks at the time of installation shall apply to the siting of this MLVT.</li> <li>11) All MLVT liner seams shall be welded and tested in accordance with applicable ASTM international standards. Any repairs to liners shall be made using acceptable practices and applicable standards.</li> <li>12) PDC Energy Inc. hereby certifies to the Director that the Modular Large Volume Tanks, utilized for the afore mentioned location, will be designed and implemented consistent with the Colorado Oil and Gas Conservation Commission policy dated June 13, 2014.</li> </ol> <p>MLVT Certification PDC Energy Inc. hereby certifies to the Director that the Modular Large Volume Tanks, utilized for the afore mentioned location, will be designed and implemented consistent with the Colorado Oil and Gas Conservation Commission policy dated June 13, 2014.</p>
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9	Dust control	805.b(1)-(c) Odors and Dust: Oil and gas facilities and equipment (PERMANENT AND TEMPORARY) will operate in a manner that odors and dust do not constitute a nuisance or hazard to public welfare. PDC will employ practices for control of fugitive dust caused by operations, these include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic. During winter operations normal dust abatement is not provided unless requested by surrounding land owners. Fugitive dust control will be incorporated as needed during all other months of drilling and completion operations.
10	Traffic control	604c.(2).D. Access Roads: Operator will utilize an improved lease access road off of CR 43 (paved) for all heavy truck traffic and rig moves along with drilling operations and maintenance equipment. The lease access road will be properly constructed and maintained to accommodate for local emergency vehicle access. PDC has an approved WOGLA and will obtain any necessary Access, Right-of-Way, or Traffic Control Permits as deemed necessary by Local Control Government.
11	Construction	604c.(2).M. Fencing Requirements: The completed wellsites will be surrounded with a fence and gate. PDC personnel will monitor the wellsites regularly upon completion of the wells. Authorized representatives and/or PDC personnel shall be on-site during drilling and completion operations.
12	Construction	604c.(2).N. Control of Fire Hazards: PDC will ensure that any material that might be deemed a fire hazard will remain no less than twenty-five (25) feet from the wellhead (s), tanks and separator(s). PDC installs automation equipment for tank level and pressure monitoring inside the bermed area that complies with API RP 500 classifications and with the current national electrical code as adopted by the State of Colorado. In compliance with Rule 606A.d., Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or liquids used for injection. Where terrain and location configuration do not permit maintaining this distance, equivalent safety measures should be taken.
13	Noise mitigation	604c.(2).A. Noise: WELL PAD: PDC has conducted baseline noise surveys for all drilling rigs that are being contracted and has also conducted a baseline noise survey for hydraulic fracture stimulation operations on a representative horizontal well. These baseline surveys are utilized for site specific noise modeling to determine if any mitigation measures are warranted. A review was conducted to identify potential receptors within 1000 feet of the proposed pad site. There are three (3) building units of concern located 804' SW, 954' SW, 978' NW. Sound mitigation consisting of 32 ft sound walls will be installed to the north, west, and south of the proposed location during drilling and completion. Prior to construction, the south and north walls will be partially installed to mitigate line of sight and sound from construction equipment. After construction is completed, equipment installed and production begins, noise levels will be assessed to determine if mitigation measures will be required to be compliant with Rule 802.
14	Emissions mitigation	604.c.(2).W. Site Specific Measures: Lights shall be turned downward and away from building units within the 1,000 foot buffer area. Sound walls (32 ft in height) will be placed on the north, west, and south side sides of the location during drilling and completion operations which will also shield light sources.
15	Odor mitigation	805.b Odor (related to OBM): Drilling fluid not being used in the active mud system shall be stored in closed, upright tanks. Additionally, an odor neutralizer will be used in the active mud system for management of odors.

16	Drilling/Completion Operations	604c.(2).C. Green Completions: Test separators and associated flow lines, sand traps and emission control systems shall be installed on-site to accommodate green completions techniques. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to a sales line or shut in and conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, the operator shall not produce the wells without an approved variance per Rule 805.b.(3)C.
17	Drilling/Completion Operations	PDC plans to transport oil from this location via pipeline, as available. Oil storage tanks will remain on location for safety concerns related to unplanned oil gathering pipeline shut downs and for routine maintenance operations. Weld County is reviewing the traffic plan, haul route and Emergency Action Plan.
18	Final Reclamation	604c.(2).O. Loadlines: All loadlines shall be bullplugged or capped.
19	Final Reclamation	604c.(2).T. Well Site Cleared: The wellsite will be cleared of all non-essential equipment within ninety (90) days after all wells associated with the pad have been plugged and abandoned.
20	Final Reclamation	604c.(2).U. Identification of Plugged and Abandoned Wells: Pursuant to rule 319.a.(5)., once the well has been plugged and abandoned, PDC will identify the location of the wellbore with a permanent monument that will detail the well name and date of plugging.

Total: 20 comment(s)

### **Attachment Check List**

<b><u>Att Doc Num</u></b>	<b><u>Name</u></b>
1010784	CORRESPONDENCE
1347752	OBJECTIVE CRITERIA REVIEW MEMO
2158205	RULE 306.E CERTIFICATION
402077978	FORM 2A SUBMITTED
402189277	PRE-APPLICATION NOTIFICATION CERTIFICATION
402189278	ACCESS ROAD MAP
402189279	SURFACE AGRMT/SURETY
402189281	OTHER
402189284	HYDROLOGY MAP
402189285	LOCATION DRAWING
402189288	LOCATION PICTURES
402189289	MULTI-WELL PLAN
402189290	NRCS MAP UNIT DESC
402189291	FACILITY LAYOUT DRAWING
402189293	WASTE MANAGEMENT PLAN
402189295	LEAK DETECTION PLAN

Total Attach: 16 Files

### **General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Final Review	Final Review Task Passed - corrections made with operator concurrence: - changed number of oil tanks from 10 to 11 on Facilities tab. - attached 306.e Certification letter. - revised distance to nearest water well to 350'. - deleted extraneous BMP and revised Access Road/Traffic Control BMP. - added COA related to pending spacing (both DSU and WSU wells are proposed for this Location).	02/05/2020
Final Review	Final review PENDING - contacted Operator for additional information: - Facility Layout Drawing indicates 11 oil tanks, but only 10 are listed on the Facilities tab of the Form 2A. Confirm and correct where needed. - Request 306.e Certification letter. - Request revision of distance to nearest water well from 585' to 350' as measured to constructed water well (permit #124019). - Request combining and clarifying access road BMPs into one clear BMP. - Request clarification of intended spacing; pending docket is for DSU, but comments on Submit tab indicate WSU.	02/04/2020
OGLA	The following changes were made with Operator concurrence or additional information provided: 1) Additional information was provided on 10/31/2019 stating that two buildings were present; however, no BU were present to the north. 2) Added a COA on OBM and neutralization for odor if complaints were received. 3) Reviewed 306.e certification letter. 4) Reviewed outreach letters to BU within 1,000 feet to 1,500 feet. 5) Updated BMP on OBM drill fluids to address shallow groundwater.	01/27/2020
OGLA	Operator provided the following responses to the requested information: 1. Updated WOGLA information. 2. Verified twelve separators on the Facility Layout Drawing (10 wellhead separators and two 2-phase upright separators). No revision necessary. 3. Confirmed docket #1906000462. 4. Updated BMP to state trash bin would be emptied upon filling. 5. Updated noise BMP with operator concurrence to using sound walls since Location is in a Buffer Zone. 6. Changed dust BMP to Emissions mitigation since BMP primarily related to lighting and dust was in a separate BMP. 7. Revised discussion of Odors and removed CDPHE AQCD regulation references from Odor BMP. 8. Changed BMP for Green Completions to standard language with Operator concurrence. 9. Removed BMPs for BOPE and drill stem since these related to downhole operations and not the Form 2A Location.	01/27/2020
OGLA	IN PROCESS – received requested information from Operator on 12/09/19; COGCC review will resume and be conducted within 60 days (by 02/07/20).	01/27/2020

OGLA	<p>ON HOLD: This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form ON HOLD until additional information is received from the applicant. In compliance with § 24-65.1-108(1), C.R.S., the COGCC is providing this written request for all additional information necessary for the COGCC to respond to this application. The applicant may provide all requested additional information to COGCC via email. Upon receipt of all requested information, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application. In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:</p> <ol style="list-style-type: none"> <li>1. Request updated WOGLA status.</li> <li>2. Number of separators on Facility Layout Drawing (10) different than Facilities tab (12).</li> <li>3. Confirm pending docket #190600462</li> <li>4. BMP #2 (housekeeping) provide timeframe for trash bin to be emptied.</li> <li>5. Provide a BMP describing site-specific noise mitigation for buffer zone.</li> <li>6. Change BMP category for "Dust" BMP since it mostly discusses lighting mitigation.</li> <li>7. Provide concurrence with removing discussion of Odors and CDPHE AQCD regulations.</li> <li>8. Provide concurrence with changing BMP for Green Completions to standard language.</li> <li>9. Provide concurrence with removing BMP #22 and #23 (BOPE) and BMP #25 (drill stem) from the Form 2A.</li> </ol>	01/07/2020
Final Review	<p>Final Review pending - referred to OGLA staff for additional review:</p> <ul style="list-style-type: none"> <li>- request updated WOGLA status</li> <li>- number of separators on Facility Layout Drawing (10) different than Facilities tab (12)</li> <li>- confirm pending docket #190600462</li> <li>- request multiple BMP revisions</li> </ul>	12/09/2019
OGLA	<p>The Objective Criteria Review Memo (Doc# 1347749) is attached to this Form 2A. Following additional analysis arising out of the Objective Criteria, the Director determined that this application meets the standard for the protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.</p>	12/05/2019
OGLA	<p>COGCC staff conducted its technical review of this Form 2A Oil and Gas Location Assessment within the context of SB 19-181 and the required Objective Criteria. This Form 2A met Objective Criteria # 1, 5.c, and 8.</p>	12/05/2019
Permit	<p>Multi-Well Plan evaluated. DSU pending docket #190600462.</p> <p>Passed Permitting.</p>	11/07/2019
OGLA	<ol style="list-style-type: none"> <li>1) The technical review of the form 2A indicated possible building units located less than 500 feet from the wells north-northwest of the Grays Federal 5N65W28 1-10 Location. Request updated information showing that Building Units are not present north-northwest of the Location.</li> <li>2) Oil &amp; Gas Location is located less than 1,000 feet of BUs, and is therefore in a buffer zone. Operator needs to provide additional information on Oil-Based Mud and neutralization for odor.</li> <li>3) Operator needs to provide the 306.e certification letter.</li> <li>4) Operator needs to provide additional information on how they "reached out" to BU owners from 1,000 feet to 1,500 feet from the Location to notify them of the proposed activities.</li> <li>5) Since the Location is in a Sensitive Area for water resources, the operator needs to provide specific information on how the OBM drill fluids will be recovered for reuse and recycling, or what BMPs will be used.</li> </ol>	10/31/2019
OGLA	<p>This form has passed completeness.</p>	10/02/2019

Total: 12 comment(s)