

Public Comment Consideration Memo - SRC Energy's Ridge State 33-17 Pad location

Public Comment Summary:

SRC Energy submitted a Form 2A Oil and Gas Location Assessment permit application to the COGCC on April 24, 2019 and 32 Form 2 Applications for Permit to Drill (APDs) to the COGCC in June 2019 for the proposed Ridge State 33-17 location. The City of Greeley LGD placed one comment on the Form 2A and one comment on an APD. A total of 101 public comments were placed on the Form 2 APDs during the public comment period. Of the 101 public comments placed across the 32 APDs, 11 public comments are unique (not duplicates).

1. The City of Greeley's comment on the Form 2A and on the APD indicated that Greeley had approved a USR permit for the location which was issued on April 23, 2019.
2. Four of the 11 unique public comments on the APDs regard concerns about potential impacts to air quality.
3. Six of the 11 unique public comments have a request for a moratorium on issuing oil and gas permits.
4. One of the 11 unique public comments regard a concern for induced seismicity from injection wells.
5. One of the 11 unique public comments had concerns with seismicity and the use and disposal of freshwater resources.

COGCC Response:

1. COGCC staff reviewed and considered all public comments received on the permits for this proposed Oil and Gas Location.
2. Concerning impacts to air quality from this proposed Oil and Gas Location: The operator will be using VOC Combustors and Vapor Recovery Units to control emissions. Gas produced from the wells will be immediately routed to a gas sales line. The operator will also be using an infrared camera to inspect all production equipment for leaks. The operator also intends to pipe away all produced liquids from the location, thus reducing truck traffic which will reduce air emissions.
3. Concerning the request for a moratorium on issuing oil and gas permits: The Colorado State Legislature and the Governor have directed the COGCC to continue to review and approve, if warranted, oil and gas permits while Rulemaking is currently taking place. Per SB19-181, the Director has created a list of Objective Criteria with which staff are applying as part of the permit review process to address possible impacts to public health, safety, welfare, the environment, and wildlife resources in the interim. The SRC Ridge State permits are subject to the Objective Criteria review and all current COGCC Rules. The Director will not approve the permits without appropriate Best Management Practices and Conditions of Approval that are sufficiently protective against potential impacts of the planned oil and gas operations.
4. Concerning induced seismicity from injection wells, the use of freshwater resources, and disposal of produced water: No injection wells are proposed for this location. The operator's planned disposal of produced water from this location must comply with all state and local requirements which include using approved water disposal methods and locations. Currently the COGCC does not regulate the amount of freshwater used for well completions.