



STATE OF
COLORADO

Christopher - DNR, Brian <brian.christopher@state.co.us>

Impetro Alice Seedorf 1 Form 2A# 402200988

9 messages

Christopher - DNR, Brian <brian.christopher@state.co.us>

Fri, Feb 21, 2020 at 3:58 PM

To: paul.gottlob@iptenergyservices.com

Cc: sbradley.impetro@gmail.com

Paul,

I am reviewing the Alice Seedorf 1 Form 2A, Doc# 402200988, and have the following questions/revisions that I would like to see made:

1. Location size after interim reclamation. 5.29 acres after interim is extremely large for a single well pad. The location drawing notes the total interim reclamation area as 0.83 acres. Please clarify.
2. Please provide updated construction start and interim start dates.
3. As it looks like this location is a well only location, please provide concurrence to drop the facility distances from the cultural setbacks.
4. Cultural distances for building and building units do not appear to account for the buildings and probable building unit ~3,650 ft. northwest of the location. Please verify and correct.
5. Cultural distances for railroad does not appear to account for the Burlington Northern line north of the location (less than a mile). Please verify and correct.
6. Location Drawing. Cultural distances on location drawing likely need updating. Please verify and correct.
7. Please provide concurrence to remove the 305A certification and the topo map attachments as they are not needed for this form.
8. Please provide concurrence to change Sensitive Area to yes under water resources as this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone.
9. While examining nearby depths to groundwater in this area, I saw that permit 6539-FP- (in Section 28) had a reported depth to water of 216 feet, reported in 2013. Please either provide concurrence to change depth to water or an explanation of why another depth is stronger.
10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains.
11. BMP#1. Fencing. Please provide concurrence to remove this BMP as it is not adding anything.
12. BMP#3. Traffic control. Please revise BMP to state whether a traffic plan is needed. This will likely lead to revisions of the first two sentences of this BMP.
13. BMP#5. Leak detection. Please remove 604 reference as this location is not in a buffer zone. Please revise BMP better describe well location inspections, rather than production location inspections. Please revise BMP to remove reference to SPCC and CFR, as COGCC does not have direct jurisdiction over these. Keeping the documented monthly inspections is good, just remove the reference to the regulations.
14. BMP#6. Dust. Please provide concurrence to remove odor from the title of this BMP as it does not address odor.
15. BMP#8. Odor. This BMP as it is written does not actually say anything. Instead of revising it, please provide concurrence to remove the BMP.
16. BMP#9. Guy Lines. Please provide concurrence to remove the 604 reference as this location is not in a buffer zone.
17. BMP#10. P&A wells. As this is covered by COGCC Rules, removal is advised. Please provide concurrence to remove BMP.
18. BMP#11. D&A wells. As this is covered by COGCC Rules and is relevant to the Form 2 not the 2A, removal is advised. Please provide concurrence to remove BMP.
19. Please provide a storm water BMP.
20. Please provide a BMP discussing chemical containment/storage for the drilling and completions phases for this location.

This location meets Objective Criteria 5.c. as it is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone, even with the deep depth to groundwater.

Please let me know if you have any questions about this.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Fri, Feb 21, 2020 at 4:25 PM

Christopher,

See below answers in red.

Will supply the Cultural Distances updates when the Surveyor responds.

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Friday, February 21, 2020 3:59 PM
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>
Cc: sbradley.impetro@gmail.com
Subject: Impetro Alice Seedorf 1 Form 2A# 402200988

Paul,

I am reviewing the Alice Seedorf 1 Form 2A, Doc# 402200988, and have the following questions/revisions that I would like to see made:

1. Location size after interim reclamation. 5.29 acres after interim is extremely large for a single well pad. The location drawing notes the total interim reclamation area as 0.83 acres. Please clarify. **The 5.29 acres is the amount left after the 0.83 ifs reclaimed.**
2. Please provide updated construction start and interim start dates. **Start 3/1/2020, Interim 6/1/2020.**
3. As it looks like this location is a well only location, please provide concurrence to drop the facility distances from the cultural setbacks. **Agreed.**
4. Cultural distances for building and building units do not appear to account for the buildings and probable building unit ~3,650 ft. northwest of the location. Please verify and correct. **Will contact the Surveyor and get back to you on this.**
5. Cultural distances for railroad does not appear to account for the Burlington Northern line north of the location (less than a mile). Please verify and correct. **Will contact the Surveyor and get back to you on this.**

6. Location Drawing. Cultural distances on location drawing likely need updating. Please verify and correct. **Will contact the Surveyor and get back to you on this.**
7. Please provide concurrence to remove the 305A certification and the topo map attachments as they are not needed for this form. **Agreed.**
8. Please provide concurrence to change Sensitive Area to yes under water resources as this location is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone. **Agreed.**
9. While examining nearby depths to groundwater in this area, I saw that permit 6539-FP- (in Section 28) had a reported depth to water of 216 feet, reported in 2013. Please either provide concurrence to change depth to water or an explanation of why another depth is stronger. **Concur to change to 216'.**
10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains.
11. BMP#1. Fencing. Please provide concurrence to remove this BMP as it is not adding anything. **Agreed.**
12. BMP#3. Traffic control. Please revise BMP to state whether a traffic plan is needed. This will likely lead to revisions of the first two sentences of this BMP. **A Rig Move permit will be secured with Washington County prior to rig move.**
13. BMP#5. Leak detection. Please remove 604 reference as this location is not in a buffer zone. Please revise BMP better describe well location inspections, rather than production location inspections. Please revise BMP to remove reference to SPCC and CFR, as COGCC does not have direct jurisdiction over these. Keeping the documented monthly inspections is good, just remove the reference to the regulations. **Leak Detention Plan: Pumper will visit the location daily and visually inspect all tanks and fittings for leaks.**
14. BMP#6. Dust. Please provide concurrence to remove odor from the title of this BMP as it does not address odor. **Agreed.**
15. BMP#8. Odor. This BMP as it is written does not actually say anything. Instead of revising it, please provide concurrence to remove the BMP. **Agreed.**
16. BMP#9. Guy Lines. Please provide concurrence to remove the 604 reference as this location is not in a buffer zone. **Agreed.**
17. BMP#10. P&A wells. As this is covered by COGCC Rules, removal is advised. Please provide concurrence to remove BMP. **Agreed.**
18. BMP#11. D&A wells. As this is covered by COGCC Rules and is relevant to the Form 2 not the 2A, removal is advised. Please provide concurrence to remove BMP. **Agreed.**
19. Please provide a storm water BMP.

Storm Water/Erosion Control	Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. Location will comply with applicable Colorado stormwater permitting requirements and associated stormwater management plan (SWMP). Impetro utilizes a ditch and berm or silt fence around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur per CDPHE stormwater regulatory requirements and any evidence of stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate.
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20. Please provide a BMP discussing chemical containment/storage for the drilling and completions phases for this location. **Closed Loop drilling system will be used and all Drilling Cuttings and Fluids will be directed to onsite containers. Water Based Drilling Fluids will be land spread and cuttings transferred to a permitted land fill.**

This location meets Objective Criteria 5.c. as it is in the W-Y Designated Groundwater Management Area and the Northern High Plains Aquifer recharge zone, even with the deep depth to groundwater.

Please let me know if you have any questions about this.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist

[Redacted]

[Quoted text hidden]

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Tue, Feb 25, 2020 at 2:06 PM

Christopher,

Attached is an updated Location Drawing with corrected Cultural Distances to address #4, 5 & 6 below – thanks for your patience!

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

[Quoted text hidden]

 **Alice Seedorf 1 - Location Drawing - 2-25-2020.pdf**
344K

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 2, 2020 at 12:41 PM

Paul,

I left a voice mail a bit ago. I wanted to discuss the location size and about whether the building was a Building Unit (1&4).

I had several of the previous requests that needed additional work:

1. Location size after interim reclamation. 5.29 acres for a one well location is huge. If this number is accurate, it will need to be justified.
2. The construction start date is already out of date. Please provide another.
3. Contrary to what I was thinking earlier, the Electric Generator and Cavity Pump do trigger the Production Facility on the Cultural Setbacks, so I will need to leave them in (never removed).
4. The building approximately 3,650 ft nw of the location appears to be a modular house. If it is not a building unit, please provide us with evidence about what it is, otherwise, we will have to regard it as a building unit. This would require an updated distance to building unit and location map.
10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains. Not answered in previous response.
19. Stormwater BMP. This contains references outside of COGCC control to remove. My suggested edits in red, below. Please let me know if these are acceptable.

Operator will implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. ~~Location will comply with applicable Colorado stormwater permitting requirements and associated stormwater management plan (SWMP).~~ Impetro utilizes a ditch and berm or silt fence around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur ~~per GDPHE stormwater regulatory requirements~~ and any evidence of

stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate.

Please let me know if you have any questions about these.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 2, 2020 at 1:37 PM

Brian,

Addresses each below in [Blue](#).

Paul Gottlob
NEW IPT INC
Office 720-420-5747
Cell 720-394-6961

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Monday, March 2, 2020 12:42 PM
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>
Cc: sbradley.impetro@gmail.com
Subject: Re: Impetro Alice Seedorf 1 Form 2A# 402200988

Paul,

I left a voice mail a bit ago. I wanted to discuss the location size and about whether the building was a Building Unit (1&4).

I had several of the previous requests that needed additional work:

1. Location size after interim reclamation. 5.29 acres for a one well location is huge. If this number is accurate, it will need to be justified. [Have asked the Surveyor to update the well-pad location size to only include the well pad and access road separately from the production facility and will send it over when received.](#)

2. The construction start date is already out of date. Please provide another. [Construction start date 3/11/2020 and reclamation 8/11/2020.](#)

3. Contrary to what I was thinking earlier, the Electric Generator and Cavity Pump do trigger the Production Facility on the Cultural Setbacks, so I will need to leave them in (never removed). [Melissa lets all the equipment be from the wellhead since that is where the pumpjack sits with it all.](#)

4. The building approximately 3,650 ft nw of the location appears to be a modular house. If it is not a building unit, please provide us with evidence about what it is, otherwise, we will have to regard it as a building unit. This would require an updated distance to building unit and location map. [OK will use same closer distance for both - Update attached.](#)

10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains. Not answered in previous response. [This is in a Wheat Field and is not near any surface water features that would require it to be deemed a sensitive area.](#)

19. Stormwater BMP. This contains references outside of COGCC control to remove. My suggested edits in red, below. Please let me know if these are acceptable.

~~Operator will~~ implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. ~~Location will comply with applicable Colorado stormwater permitting requirements and associated stormwater management plan (SWMP).~~ Impetro utilizes a ditch and berm or silt fence around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur ~~per CDPHE stormwater regulatory requirements~~ and any evidence of stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate. [Agreed](#)

Please let me know if you have any questions about these.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist

[Redacted signature]

[Quoted text hidden]

[Quoted text hidden]

 **Alice Seedorf 1 - Location Drawing - 2-25-2020.pdf**
354K

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Tue, Mar 3, 2020 at 8:21 AM

Brian,

Attached is the updated Location Drawing:

Total Initial Disturbed Area is 5.7 Acres.

Size after interim reclamation is 4.93 Acres.

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

From: Christopher - DNR, Brian <brian.christopher@state.co.us>

Sent: Monday, March 2, 2020 12:42 PM

To: Paul Gottlob <paul.gottlob@iptenergyservices.com>

Cc: sbradley.impetro@gmail.com

Subject: Re: Impetro Alice Seedorf 1 Form 2A# 402200988

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I had several of the previous requests that needed additional work:

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2. The construction start date is already out of date. Please provide another.
3. Contrary to what I was thinking earlier, the Electric Generator and Cavity Pump do trigger the Production Facility on the Cultural Setbacks, so I will need to leave them in (never removed).
4. The building approximately 3,650 ft nw of the location appears to be a modular house. If it is not a building unit, please provide us with evidence about what it is, otherwise, we will have to regard it as a building unit. This would require an updated distance to building unit and location map.
10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains. Not answered in previous response.
19. Stormwater BMP. This contains references outside of COGCC control to remove. My suggested edits in red, below. Please let me know if these are acceptable.

Operator will implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. ~~Location will comply with applicable Colorado stormwater permitting requirements and associated stormwater management plan (SWMP).~~ Impetro utilizes a ditch and berm or silt fence around the perimeter of the pad to contain sediment and will install sediment traps when adequate slopes allow. At the conclusion of construction, disturbed areas not required for ongoing operations and the topsoil spoil pile will be seeded with an appropriate seed mix. Inspections will occur ~~per CDPHE stormwater regulatory requirements~~ and any evidence of stormwater erosion will be repaired. Culverts will be installed along the lease road and maintained clear of sediment where appropriate.

Please let me know if you have any questions about these.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist

[Redacted]

[Quoted text hidden]

[Quoted text hidden]

 **Alice Seedorf 1 - Location Drawing - 3-3-2020.pdf**
346K

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Tue, Mar 3, 2020 at 8:23 AM

Brian,

Use this one.

[Quoted text hidden]

 **Alice Seedorf 1 - Location Drawing - 3-3-2020.pdf**
359K

Christopher - DNR, Brian <brian.christopher@state.co.us>
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 9, 2020 at 2:36 PM

Paul,

The information I am still waiting on:

1. Location size after interim reclamation. 4.93 acres is still huge. We see multi-well pads with tanks that are on smaller post-interim reclamation sizes than this. If a pad this size is needed (post reclamation), it needs to be justified. Otherwise, reduced.

10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains. Due to the W-Y and the Northern High Plains, this location will be in a sensitive area for water resources, regardless of depth to water or distance to surface water.

Additionally, two additional points came up,

21. The scale bars on the Location Drawing and Hydrology Map are not consistent (100 ft for first half, 400 ft for same distance on second half).

22. Floodplain determination. I do not believe that FEMA or the state generate floodplain maps for this portion of the state. While I determined in my technical analysis that this is not in a floodplain, I do not know of any floodplain maps that cover this area. Unless there are maps of which I am not aware, please provide concurrence to uncheck the Federal and State boxes. If there are no other maps, please provide me with a rationale or with concurrence to check the 'other' box and add a comment about my determination on the technical review.

Thanks,

Brian Christopher
Oil & Gas Location Assessment Specialist



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894.2100 x5271
1120 Lincoln Street, Suite 801, Denver, CO 80203
Brian.Christopher@state.co.us | www.colorado.gov/cogcc

[Quoted text hidden]

Paul Gottlob <paul.gottlob@iptenergyservices.com>
To: "Christopher - DNR, Brian" <brian.christopher@state.co.us>
Cc: "sbradley.impetro@gmail.com" <sbradley.impetro@gmail.com>

Mon, Mar 9, 2020 at 3:57 PM

Brian,

Answers below in **Red**.

Paul Gottlob

NEW IPT INC

Office 720-420-5747

Cell 720-394-6961

From: Christopher - DNR, Brian <brian.christopher@state.co.us>
Sent: Monday, March 9, 2020 2:37 PM
To: Paul Gottlob <paul.gottlob@iptenergyservices.com>
Cc: sbradley.impetro@gmail.com
Subject: Re: Impetro Alice Seedorf 1 Form 2A# 402200988

Paul,

The information I am still waiting on:

1. Location size after interim reclamation. 4.93 acres is still huge. We see multi-well pads with tanks that are on smaller post-interim reclamation sizes than this. If a pad this size is needed (post reclamation), it needs to be justified. Otherwise, reduced. **Impetro is ok with just making the well pad 400' x 400', which would make the Size of disturbed area 5.89 Acres, and Size of loc. After interim reclamation and was just wanting to make sure they had enough space for this new Rig with a Closed Loop system. COGCC had suggested previously when other operators were making their pads only 350' x 350' that they make them larger as it was too tight for closed loop systems. And the Surface Owners have agreed to what the Operator permits.**

10. Please provide a new sensitive area for water resources comment that addresses that the location is in the W-Y and Northern High Plains. Due to the W-Y and the Northern High Plains, this location will be in a sensitive area for water resources, regardless of depth to water or distance to surface water. **This site is deemed to be in a Sensitive Area due to being within the W-Y and Northern High Plains.**

Additionally, two additional points came up,

21. The scale bars on the Location Drawing and Hydrology Map are not consistent (100 ft for first half, 400 ft for same distance on second half). **Both updated and attached.**

22. Floodplain determination. I do not believe that FEMA or the state generate floodplain maps for this portion of the state. While I determined in my technical analysis that this is not in a floodplain, I do not know of any floodplain maps that cover this area. **Please uncheck both the Federal (FEMA) and State boxes under the Floodplain Data Sources.** Unless there are maps of which I am not aware, please provide concurrence to uncheck the Federal and State boxes. If there

are no other maps, please provide me with a rationale or with concurrence to check the 'other' box and add a comment about my determination on the technical review.

[Quoted text hidden]

[Quoted text hidden]

2 attachments

 **Alice Seedorf 1 - Hydrology Map.pdf**
336K

 **Alice Seedorf 1 - Location Drawing - 3-9-2020.pdf**
378K