



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

COGCC Form 2A review of Extraction's Maverick 1-O Pad location - Doc #401560473

2 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Bonnie Lamond <blamond@extractionog.com>

Wed, Oct 24, 2018 at 8:25 AM

Bonnie,

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

- 1) In the Facilities section Extraction has indicated there will be 11 separators on this proposed Oil & Gas Location. However, a review of the Facility Layout Drawing shows what appears to be 12 separator inside the separator berm area and two 2-phase separators outside it for a total of 14 separators. Please confirm the number of separators.
- 2) In the Facilities section Extraction has indicated there will be 5 emission control devices on this proposed Oil & Gas Location. However, a review of the Facility Layout Drawing shows what appears to be 4 emission control devices. Please confirm the number of separators.
- 3) A review of the Facility Layout Drawing shows 2 pits inside the tank berm; however, no pits are listed in the Facilities section. Please clarify what these pits are.
- 4) The Facility Layout Drawing depicts a Maintenance Tank, but it is not listed in the Facilities section. Therefore, I would like to add it to the Other Facilities section.
- 5) In the Cultural Setback Distance section Extraction has indicated the nearest Building Unit from a well is 515 feet. However, a review of the Form 2 APD for the Maverick 2W-15-1N well indicates the nearest Building Unit is 506 feet. Therefore, I would like to change the distance from the nearest Building Unit to the nearest well from 515 feet to 506 feet.
- 6) In the Cultural Setback Distance section Extraction has indicated the nearest Building & Building Unit from the nearest production facility is closer than from the nearest well. As the nearest Building & Building Unit are to the west and the Facility Layout Drawing shows the wells being further to the west than the production facilities, the distance from the nearest production facility does not make sense. Based on where they are shown on the Facility Layout Drawing, the nearest production facility to a Building & Building Unit should be further than the distances give from a well. Please review these distances with what is shown on the Facility Layout Drawing and let me know which is correct.
- 7) Similar to my comment #6 above is the distances from the nearest production facility to a Public Road and Above Ground Utility. The nearest Public Road and Above Ground Utility are to the south, and the Facility Layout Drawing shows production facilities closer to them than the wells. However, the distances to these two cultural features is greater than what is indicated from the nearest well. Please review these distances with what is shown on the Facility Layout Drawing and let me know which is correct.
- 8) Extraction has provide a Siting Rationale for the placement of the proposed Oil & Gas Location. However, Rule 604.c.(2)E.i indicates operators are to locate the production facilities as far as possible from Building Units. Please revise the Siting Rationale to include a discussion of how the proposed placement of the production facilities on the location are as far as possible from all Building Units within the Buffer Zone.
- 9) Extraction has provided a few 604.c.(2) mitigation measures that address Blowout Prevention Equipment. These BMPs should be placed on the Form 2 APDs, not the Form 2A. Therefore I would like to remove them from the Form 2A.

10) Now that the Public Comment period has ended, please provide me with a letter certifying Extraction's compliance with COGCC Rule 306.e. If any meetings/consultation were requested please also indicate their outcome.

Please respond to this correspondence by November 24, 2018. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

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5K

Bonnie Lamond <blamond@extractionog.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Nov 7, 2018 at 11:06 AM

Hi Doug,

Please see my responses in blue below. Let me know if you have any other questions during your review.

Regards,

Bonnie Lamond

Extraction Oil & Gas

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Wednesday, October 24, 2018 8:25 AM
To: Bonnie Lamond <blamond@extractionog.com>
Subject: COGCC Form 2A review of Extraction's Maverick 1-O Pad location - Doc #401560473

Bonnie,

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

- 1) In the Facilities section Extraction has indicated there will be 11 separators on this proposed Oil & Gas Location. However, a review of the Facility Layout Drawing shows what appears to be 12 separator inside the separator berm area and two 2-phase separators outside it for a total of 14 separators. Please confirm the number of separators. Please see the revised Facility Layout Drawing, which shows the updated numbers. There should be a total of 14 separators.
- 2) In the Facilities section Extraction has indicated there will be 5 emission control devices on this proposed Oil & Gas Location. However, a review of the Facility Layout Drawing shows what appears to be 4 emission control devices. Please confirm the number of separators. Please see the revised Facility Layout Drawing. Number of ECDs should be changed to 4.
- 3) A review of the Facility Layout Drawing shows 2 pits inside the tank berm; however, no pits are listed in the Facilities section. Please clarify what these pits are. It is a lined drain pit for water (drainage feature).

- 4) The Facility Layout Drawing depicts a Maintenance Tank, but it is not listed in the Facilities section. Therefore, I would like to add it to the Other Facilities section. [Yes, please add the Maintenance Tank to the equipment list.](#)
- 5) In the Cultural Setback Distance section Extraction has indicated the nearest Building Unit from a well is 515 feet. However, a review of the Form 2 APD for the Maverick 2W-15-1N well indicates the nearest Building Unit is 506 feet. Therefore, I would like to change the distance from the nearest Building Unit to the nearest well from 515 feet to 506 feet. [The Maverick 2W-15-1N well should be changed to 515'](#)
- 6) In the Cultural Setback Distance section Extraction has indicated the nearest Building & Building Unit from the nearest production facility is closer than from the nearest well. As the nearest Building & Building Unit are to the west and the Facility Layout Drawing shows the wells being further to the west than the production facilities, the distance from the nearest production facility does not make sense. Based on where they are shown on the Facility Layout Drawing, the nearest production facility to a Building & Building Unit should be further than the distances give from a well. Please review these distances with what is shown on the Facility Layout Drawing and let me know which is correct. [The distances that were used were from an outdated version. The wells should have closer distances to the BUs than the facilities. The measurements for the facilities should be as follows:](#)

Distance to nearest:	Distance	Direction	Feature Measured From*
Building:	465'	W	COMPRESSOR
Building Unit:	533'	W	COMPRESSOR
High Occupancy Building Unit:	5280'	SW	MAINTENANCE TANK
Designated Outside Activity Area:	5280'	SW	MAINTENANCE TANK
Public Road:	319'	S	MAINTENANCE TANK
Above Ground Utility:	303'	S	MAINTINENCE TANK
Railroad: Feet	5280'	SW	MAINTINENCE TANK
Property Line:	48'	E	COMPRESSOR

Distance to nearest:	Distance	Direction	Feature Measured From*
Building:	462'	W	MAVERICK 2W-15-1N
Building Unit:	515'	W	MAVERICK 2W-15-1N
High Occupancy Building Unit:	5280'	SW	MAVERICK 2W-20-9N
Designated Outside Activity Area:	5280'	SW	MAVERICK 2W-20-9N
Public Road:	405'	S	MAVERICK 2W-20-9N
Above Ground Utility:	391'	S	MAVERICK 2W-20-9N
Railroad: Feet	5280'	SW	MAVERICK 2W-20-9N
Property Line:	306'	E	MAVERICK 2W-20-9N

7) Similar to my comment #6 above is the distances from the nearest production facility to a Public Road and Above Ground Utility. The nearest Public Road and Above Ground Utility are to the south, and the Facility Layout Drawing shows production facilities closer to them than the wells. However, the distances to these two cultural features is greater than what is indicated from the nearest well. Please review these distances with what is shown on the Facility Layout Drawing and let me know which is correct. [Please use the distances listed in the table above.](#)

8) Extraction has provide a Siting Rationale for the placement of the proposed Oil & Gas Location. However, Rule 604.c.(2)E.i indicates operators are to locate the production facilities as far as possible from Building Units. Please revise the Siting Rationale to include a discussion of how the proposed placement of the production facilities on the location are as far as possible from all Building Units within the Buffer Zone.

Operator's proposed oil and gas development is within a Buffer Zone Designated Setback Location. Alternative locations were evaluated, and the final proposed location was deemed the most viable during negotiations with the surface owner. The proposed

location was strategically placed as close to the parcel boundary as possible, while maintaining enough distance to surrounding Building Units, in order to preserve the remaining land use for potential future housing development and as far away from Franklin Lake as possible. The surface owner also has a separate Surface Use Agreement with another operator that places both oil and gas sites as close together as possible.

Extraction's proposed production equipment was placed on the east side of the well row, furthest away from the Building Units to the west. They are situated as far north as possible in order to avoid closer proximity to the Building Units to the south, while also preserving the land for future development per the surface owner's request.

9) Extraction has provided a few 604.c.(2) mitigation measures that address Blowout Prevention Equipment. These BMPs should be placed on the Form 2 APDs, not the Form 2A. Therefore I would like to remove them from the Form 2A. OK.

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

Please respond to this correspondence by November 24, 2018. If you have any questions, please contact me.
Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado

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2 attachments



306 e Certification Letter.pdf

119K



2018.11.07 Pad 6N67W01.42 Maverick 1-O Facility Layout Drawing.pdf

672K