



STATE OF
COLORADO

Noto - DNR, John <john.noto@state.co.us>

Bolton TY Locations - Production Facility Explanation

Noto - DNR, John <john.noto@state.co.us>

Fri, Feb 6, 2015 at 3:57 PM

To: Kelsi Welch <Kelsi.Welch@pdce.com>

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>, Rebecca Treitz - DNR <rebecca.treitz@state.co.us>

Kelsi,

Thank you for your email response to our phone conversation regarding the proposed siting of Production Facilities at the PDC Bolton 3N68W7TY. COGCC's technical review of proposed Production Facilities in Buffer Zones is primarily based on information provided by the Operator. The explanation entered by the Operator on the Form 2A and any attachments should be detailed and specific to Production Facilities rather than Well locations. COGCC also does a cursory review of the surrounding area to identify potential locations that are not in Buffer Zones, where construction is potentially feasible, and where there is potentially less impact to neighbors (see attached). Using this information, COGCC evaluates compliance with Rule 604.c.(2)Ei:

E. Multi-well Pads.

i. Where technologically feasible and economically practicable, operators shall consolidate wells to create multi-well pads, including shared locations with other operators. Multi-well production facilities shall be located as far as possible from Building Units.

The reasons for selecting or not selecting a location may include, but are not limited to:

- a) Technical and economic feasibility,
- b) Environmental and topographic considerations,
- c) Right to construct considerations,
- d) Surface Owner and adjacent owner considerations,
- e) Cultural concerns such as: access, infrastructure, proximity to Building Units, and future development plans, etc,
- f) Public concerns, and
- g) Local government input.

Supporting information to include on the Siting Rational attachment may include;

- a) Figures, not limited to: tax assessor map screen shots, flood plain maps, property surveys, aerial images, maps or aerial images showing Building Units and depicting radii showing the relative position of the Oil and Gas Location.
- b) Narrative descriptions of interactions with Surface Owners, nearby Building Unit owners, Local Governments and neighborhood organizations.
- c) Descriptions of development plans and planning documents that played a role in the proposed siting.
- d) Attestations by Operator or third parties.

COGCC was not provided with sufficient information on the Form 2A or in the email to support the siting of the

proposed Production Facility (see COGCC's comments in blue below). Please provide additional information or submit an alternative location for review.

PDC considered many options surrounding the drill unit and could not find a better option than its current location. The property owners to the North would not allow us to put any wellheads or equipment on their property, so we had to put all 8 well heads and the production facility on the Bolton property. [This generally explains the rationale for placement on the Bolton property as opposed to the area to the north, however, more details about why alternative locations were not available will help COGCC's review process.](#)

Drilling from the west side of the unit is not feasible per geology and there is a housing subdivision on the west side that prevents us from putting the production facility there. [Impacts to the houses to the west should be a consideration, however, these houses are approximately 2,700 feet from the proposed Production Facilities, it is not explained how the houses to the west are an obstacle that will prevent moving the Production Facilities out of the Buffer Zone.](#)

Using the legal window is not feasible due to drilling constraints because the kicks would be too long. Pushing the production facility any further West would bring it closer to building units and cause more permanent surface disturbance than necessary for the surface owner. [Pushing the Production Facility west will place it further from Building Units to the east and closer to those to the west, the relative impacts should be described in more detail. A more detailed explanation of the additional surface disturbance issue will also help COGCC's review process.](#)

PDC has been in contact with both building unit owners within the 500' buffer zone. PDC has met with both owners and shared our plans with them. Both are aware of and okay with the current placement of the production facility. [The Surface Owner is apparently one of the two Building Unit owners in the Buffer Zone, if true, this should be indicated. Details about meetings, discussions, agreements, and Surface Owner preferences are an important consideration for COGCC's review process.](#)

Please feel free to call or email if you have questions or concerns.

Best regards,

John Noto

[Quoted text hidden]

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John Noto P.G.

Oil and Gas Location Assessment Supervisor



5/27/2015

State.co.us Executive Branch Mail - Bolton TY Locations - Production Facility Explanation

P 303.894-2100 ext 5182 | C 720.498-5298

1120 Lincoln Street, Suite 801, Denver, CO 80203

john.noto@state.co.us | www.colorado.gov/cogcc



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