

March 17, 2022

Brett A. Limbaugh
Development Services Director
City of Loveland
410 5th St.
Loveland, CO 80537

RE: MRG, LP
CS Oil and Gas Development Plan
SENE Section 16, T5N R68W

Dear Mr. Limbaugh:

In accordance with Colorado Oil and Gas Conservation Commission (COGCC) Rule 302, Ardor Environmental, LLC (Ardor), is providing this letter on behalf of MRG, LP (MRG), to inform the City of Loveland of their intent to submit an Oil and Gas Development Plan (OGDP) within your jurisdiction.

MRG's contact info is:

MRG, LP
2725 Rocky Mountain Ave.
Loveland, CO 80538

Ardor is the permitting representative for MRG. Any permit-related questions may be directed to:

Ms. Jessica Donahue
Ardor Environmental, LLC
jdonahue@ardorenvironmental.com
(303) 888-4862

If you wish to reach out to the COGCC, their contact information is as follows:

<https://cogcc.state.co.us/#/home>
303-894-2100

In the CS OGDP, MRG is proposing to construct one (1) new oil and gas location in the SENE Section 16, T5N R68W. The location will propose to have up to 11 horizontal wells drilled. MRG does not currently anticipate the need to seek any variances under COGCC Rule 502 but reserves the right to exercise that option if the circumstances so require.

MRG anticipates the following development schedule:

Construction Phase: **January 2023**

The CS location is anticipated to take approximately three weeks to construct. Topsoil will be segregated from the surface and stored to be used later in reclamation activities. The CS location will have stormwater controls and best management practices installed prior to commencement of construction to ensure soils remain on location. The location will be accessed via E County Road 20E.

The construction phase will consist mostly of preparation of the new location and will not have a significant impact on traffic patterns. There will be industrial equipment utilized, including dozers and scrapers, to build the location; this equipment will be mobilized to location at commencement of construction and removed once construction has been completed. During the construction phase, traffic will primarily be pick-up trucks to transport workers to the site.

Drilling Phase: **February 2023**

MRG intends to drill all wells proposed for this location in one occupation. The drilling rig will be mobilized to the location and will be utilized to drill 11 horizontal oil wells. Traffic activity will increase in the areas during delivery of supplies, equipment, or personnel. Once drilling is completed, the rig will be moved off location; the rig will not be stored at the location.

The drilling phase is anticipated to last approximately ninety (90) days at this location, with an increase of traffic consisting of twenty (20) light vehicle roundtrips per day, twenty (20) heavy vehicle roundtrips per day, for a total increase of forty (40) roundtrips per day or 1.7 roundtrips per hour. This will equate to approximately three thousand six hundred (3,600) total additional vehicle roundtrips.

During drilling, noise levels for the area may be increased above normal ambient levels but will meet COGCC Table 423-1 and City of Loveland Unified Code Chapter 7.32.040 levels. Lights will be on location for safety reasons during 24-hour operations; these lights will be tilted downward and shielded as much as safely feasible.

Completion Phase: **May 2023**

Once all wells are drilled, a completions rig will be mobilized to location to begin completing the wells. MRG intends for the completions operations to be one occupation of the location. Traffic activity will increase in the areas during delivery of supplies, equipment, or personnel. Once completions activities are concluded, the rig will be moved off location. The rig will not be stored at the location.

The completions phase is anticipated to last approximately ninety (90) days at this location, with an increase of traffic consisting of twenty (20) light vehicle roundtrips per day, twenty (20) heavy vehicle

roundtrips per day, for a total increase of forty (40) roundtrips per day or 1.7 roundtrips per hour. This will equate to approximately three thousand six hundred (3,600) total additional vehicle roundtrips.

During completions, noise levels for the area may be increased above normal ambient levels but will meet COGCC Table 423-1 levels and City of Loveland Unified Code Chapter 7.32.040 levels. Lights will be on location for safety reasons during 24-hour operations; these lights will be tilted downward and shielded as much as safely feasible.

Flowback Phase: **August 2023**

Once all wells on the location are completed, the flowback phase will begin. Flowback equipment will consist of temporary separation equipment that is designed to handle the large amounts of water and sand that will be flowing from the wells and temporary water tanks that will store the returned water on location until it can be removed from the location for disposal.

The flowback phase is anticipated to last approximately thirty (30) days at this location, with an increase of traffic consisting of ten (10) light vehicle roundtrips per day, thirty-five (35) heavy vehicle roundtrips per day, for a total increase of forty-five (45) roundtrips per day. This will equate to approximately one thousand three hundred fifty (1,350) total additional vehicle roundtrips.

During flowback, noise levels will be compliant with COGCC Table 423-1 and City of Loveland Unified Code Chapter 7.32.040 levels. Noise-generating equipment on location will be minimal. Lights will be on location to ensure safe 24-hour operations; these lights will be shielded and tilted downward as much as safely feasible.

Production Phase: **Beginning September 2023**

These wells are anticipated to commence production in December 2023.

The location will be visited by a lease operator regularly. These visits will be conducted in light vehicles.

The location will be connected to pipelines to transport produced hydrocarbons and fluids offsite. This will minimize the number of heavy vehicles required to visit the site.

We have included a map of the proposed haul routes, see Attachment A.

Please note we have attached the following COGCC Informational Sheets as Attachment B:

- The COGCC's information sheet about the procedural steps involved with the COGCC Director's and COGCC's review of Oil and Gas Development Plans;
- The COGCC's information sheet about the COGCC's public comment process and the relevant deadlines;
- The COGCC's information sheet about Hydraulic Fracturing Treatments;
- The COGCC's information sheet about how the public may view the status of the proposed Oil and Gas Development Plan application on the COGCC's website;

- Information on how the public may learn more details about and ask questions about the Oil and Gas Development Plan prior to the closure of the public comment period.

We appreciate your assistance in this matter. Please feel free to reach out to me with any questions.

Sincerely



Ms. Jessica Donahue

Permitting and Compliance Specialist
Ardor Environmental, LLC

Attachments:

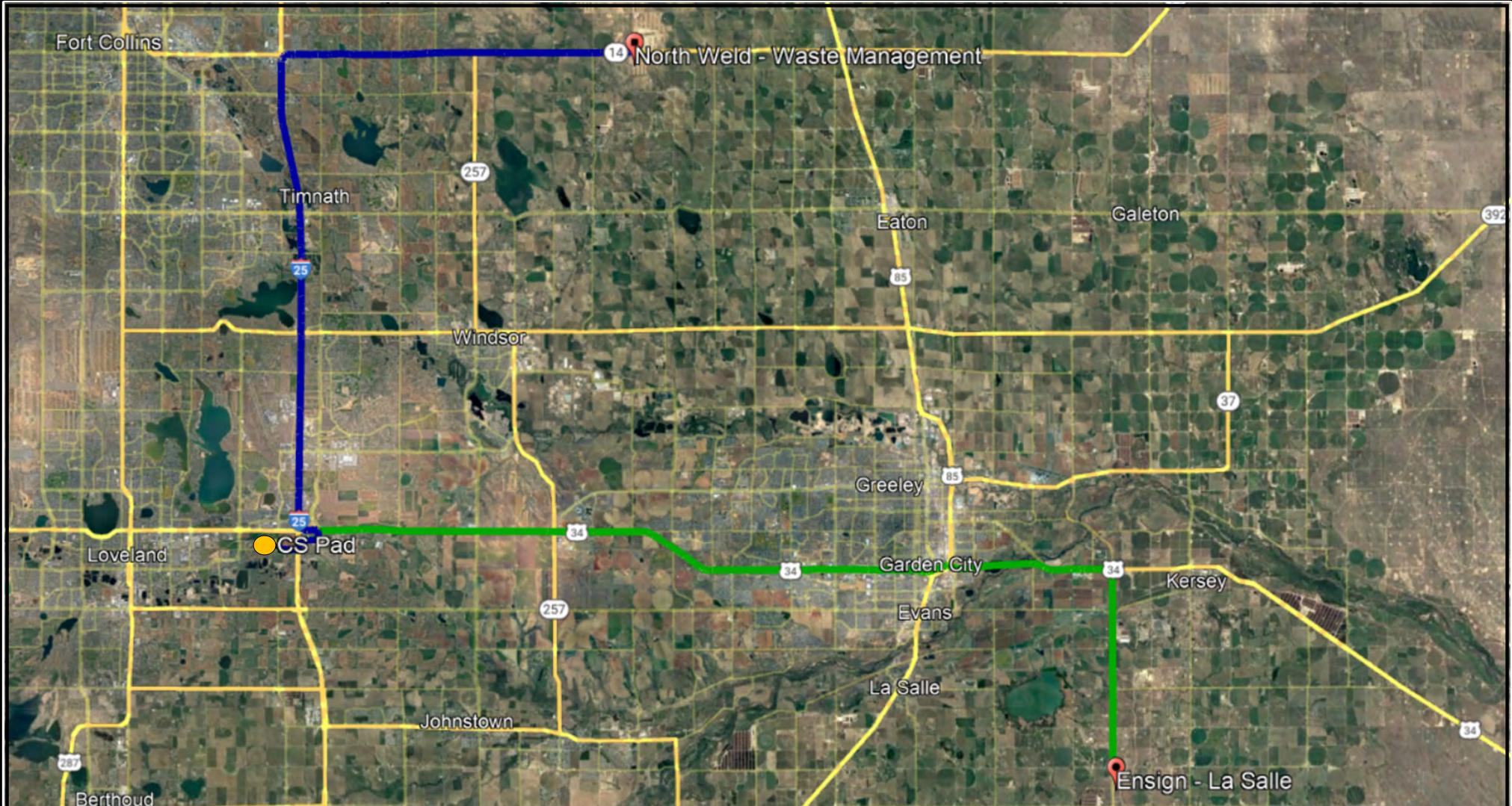
Attachment A – Map of Proposed Haul Routes

Attachment B – COGCC Information Sheets

cc: MRG, LP, and Consultants of MRG, LP

ATTACHMENT A

Map of Proposed Haul Routes



CS Pad
MRG, LP
SENE Section 16, T5N R68W
Haul Route Map

Legend



Waste Haul Route



Equipment Haul Route



Proposed Location



0 ft

3.5 Mi

7 Mi



Prepared By:
Ardor Environmental LLC

March 16, 2022

ATTACHMENT B

COGCC Information Sheets



INFORMATION SHEET: OGDP STATUS INFORMATION

(As required by COGCC Rule 303.e.(2).G)

Why am I receiving this information sheet?

The Colorado Oil and Gas Conservation Commission (“COGCC”) prepared this information sheet to inform the public in the vicinity of a proposed Oil and Gas Development Plan (“OGDP”) how to access documents and view the status of proposed OGDPs through the COGCC’s website, eForms, and eFiling system. A review of public property records indicates that you may have an interest in lands that an oil and gas operator wishes to develop as part of an OGDP. Pursuant to Commission Rule 303.e.(2).G, operators are required to provide this information sheet to certain recipients near their development plans.

What is an Oil and Gas Development Plan?

An OGDP is an operator’s plan to develop subsurface oil and gas resources (“minerals”) from one or more surface locations. An OGDP consists of a hearing application and associated permit materials that provide technical information. The Director (i.e. COGCC Staff) reviews the technical information and makes a recommendation to the Commission for the hearings application; the Commission has the ultimate authority on approval or denial of the OGDP.

How do I view the status of the pending OGDP hearing application?

Members of the public may view the status of proposed OGDP applications through the COGCC eFiling System by creating an account in the Applications and Docket Portal, available on the “Hearings Page.”

1. Go to www.COGCC.state.co.us and click on the green “Commission Hearings” button:

Commission Hearings
(Click Here)

2. On the right-hand side of the Hearings page, in the Operator Tools box header, click on “Application and Docket Portal”:

Operator Tools
* Application & Docket Portal

3. Create a user account by clicking “Request Access to Site,” and completing the required registration information. There may be a delay for processing following your request before

you are granted access. Check your email for access approval.

4. Once registration is complete, access the Application and Docket Portal by entering your user name and password.
5. At the bottom left of the page, find the panel labeled “Find Hearing Application by Docket Number” and enter the 9-digit docket number provided by the operator in their cover letter in the field named “Docket Number”:

Find Hearing Application by Docket Number	
SEARCH	RESULTS
Docket Number	
210012345	

6. The general status of the docket is listed in the first column on the left, titled “Docket Status.”
7. Double click the docket search result to load the docket’s main page, which will show additional information, including the application type, status, assigned Hearing Officer, and applicant information.

Do I have to create an account to view documents?

No. You may view documents through the “Document Search” described below without creating an eFiling System account, but you will not be able to view the “status” of the docket through this method.

1. On the right-hand side of the Hearings page, in the Public Tools box, click on the “Document Search” link:

Public Tools

- How to find Information
- How to make Public Comments
- How to find status of Oil & Gas Development Plan (OGDP)
- Document Search

2. From the “Search Type” dropdown menu, select “DNRCOG Search for Docket Related Documents”:

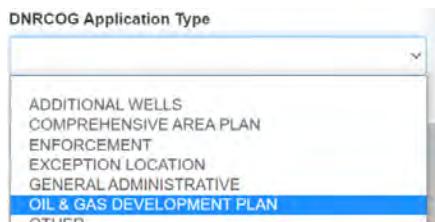
Search Type
DNRCOG New Applications
DNRCOG New Applications
DNRCOG New Documents
DNRCOG Search for Docket Related Documents

3. Input the docket number provided by the operator.

DNRCOG Docket Number

210012345

4. If you don't have a docket number, or to view any OGDP, scroll down to the "DNRCOG Application Type" dropdown menu and select "OIL & GAS DEVELOPMENT PLAN":



5. Scroll down and click the "Search" button.
6. A table of all related documents will appear. Click on any item to view its contents or download to your computer.

How do I view general forms, permits, and data regarding permits and OGDPs?

Use the Daily Activity Dashboard (DAD) to access frequently requested oil and gas data at the county and state levels. The DAD link is located in the right-hand corner of the COGCC homepage:

Daily Activity
Dashboard
(DAD)

It allows you to generate statistical charts, graphs, tables, and maps for information including pending permits, well status, production, well inspections, Notices of Alleged Violation, active notifications, and spills. The COGCC also provides access to pending and approved permits through its "Permits Search" and interactive map on the COGCC website.

To view the status of pending Form 2As (Oil and Gas Location Assessment Permits) through the "Permit Search" function, follow the steps outlined below:

1. Click "Permits" in the green menu bar on the COGCC homepage. This will take you to the "Drilling and Location Permits Search" page.
2. Under Pending Permits, find "Oil & Gas Location Assessment Permits (Form 2A)". Select "All Counties" or a specific county using the drop down menu and click "Go!":

Pending Permits (Filed ON or AFTER January 15th, 2021)

Oil & Gas Location Assessment Permits (Form 2A):

3. A table will show all pending Form 2As currently under review by the COGCC.

Pending Location Permits - All Counties

Doc Number (Public Comment Link)	Final day of Public Comment Period (Close of Drilling)	Received	Location Name (Documents Link)	Status	Issue Date	Revised 2B Date	Revised 2C Date Number	Type of Permit	Qtr	Section	Township	Range	County
20210001	01/18/2021	01/18/2021	Well 1001	In Process	01/18/2021			New Location	01/00	10	40	100	DEKTER
20210002	01/18/2021	01/18/2021	Well 1002	In Process	01/18/2021			New Location	01/00	10	40	100	DEKTER
20210003	01/18/2021	01/18/2021	Well 1003	In Process	01/18/2021			New Location	01/00	10	40	100	DEKTER

- a. Clicking a "Doc Number" link will take you to the Public Comments portal for that pending permit.
- b. Clicking a "Location Name" link will take you to a list of documents related to that permit, including the Form 2A (as submitted by the operator) and supporting documents that are attached to the pending permit application.

Can I view pending applications on the COGCC Map?

Yes. You may access the COGCC GIS Online Interactive Map by clicking "Maps" in the green banner on the COGCC homepage, then click "Click HERE to access interactive map". You may use the "address search" option to zoom to your address to see oil and gas activity near you. With the map zoomed to your area of interest, you may specify pending permits by checking the appropriate boxes on the left-hand menu:



To select and view a pending application, use the arrow tool to double-click on the pending icons to display the Application.

Where can I get additional information?

COGCC Homepage:

<https://cogcc.state.co.us/#/home>

Hearings Page:

<https://cogcc.state.co.us/reg.html#/hearings>

eFiling system help:

http://cogcc/documents/reg/Hearings/External_E_filing_System_Users_Guidebook_20201109.pdf

COGCC GIS Online Interactive Map help:

<http://cogcc/documents/about/Help/Search%20pending%20permits%20on%20the%20COGCC%20map.pdf>



PUBLIC INFORMATION

How to Find Documents for Commission Hearing Applications

Document Change Log

Change Date	Description of Changes
3/19/2021	Document created

From the COGCC home page (<https://cogcc.state.co.us>), click on "Commission Hearings":

The screenshot shows the COGCC home page with a red arrow pointing to the 'Commission Hearings' button in the top right corner of the main content area. The page includes navigation links like 'About Us', 'Complaints', 'Dashboard', 'Data', 'Government', 'Library', 'Maps', 'Media', 'Permits', 'Regulation', and 'SB 19-181'. The 'Commission Hearings' section contains information about a work session on March 26th and a March 17th hearing, along with links for financial assurance and operator training.

On the Commission Hearings page, there are two primary tool boxes; one for the general public and one for operators and their agents. This document focuses only on the Public Tools box:

The screenshot shows the 'Hearings Schedule & Information' section of the COGCC Commission Hearings page. It lists hearing dates for January 6, 13, and 20, 2021, with links to agendas and information. A red arrow points to the 'Public Tools' section on the right, which contains a list of links for finding information, making public comments, and other resources. The 'Public Tools' section is also highlighted with a yellow box.

Docket Number

Each application or matter is assigned a Docket Number. Docket numbers have nine digits where the first four digits are the two digit year and two digit month that the application was filed, or the matter was initiated; the last five digits are the sequential number of the matter for the given year. For example, 210200013 is the thirteenth docket created for the year 2021 and was created in February of that year.

The Docket Number is used to identify that application, or matter, before the Commission. It is also used to file and organize all the documents for that application.

Docket Number in Agenda

Hearing agendas include the docket number of the matter before the Commission. Hearing agendas may be found in the Upcoming Events panel on the COGCC home page:



The screenshot shows the COGCC home page with the 'Upcoming Events' section highlighted. It lists a 'Weekly Commission General Meeting' for Wednesday, Mar 24, 2021, at 10 AM. A red arrow points to the 'Agenda' link, which is a blue button with white text. Below the agenda link, there is a link to 'Click here to access the March 17th Commission Hearing'.

Commission agendas may also be found in the Hearings Schedule & Information panel on the Commission Hearings page:



The screenshot shows the COGCC Commission Hearings page with the 'Hearings Schedule & Information' panel highlighted. It lists two hearings: 'January 06, 2021' and 'January 13, 2021'. For the January 06, 2021, hearing, a red arrow points to the 'Agenda' link, which is a blue button with white text. The 'Public Tools' panel on the right contains a list of links related to hearings and public comment.

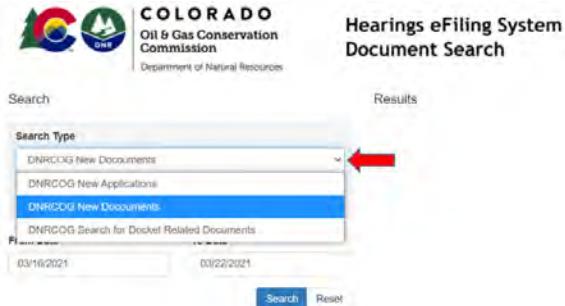
Document Search Tool

To find the documents related to any matter before the Commission, click on the Document Search link in the Public Tools box:



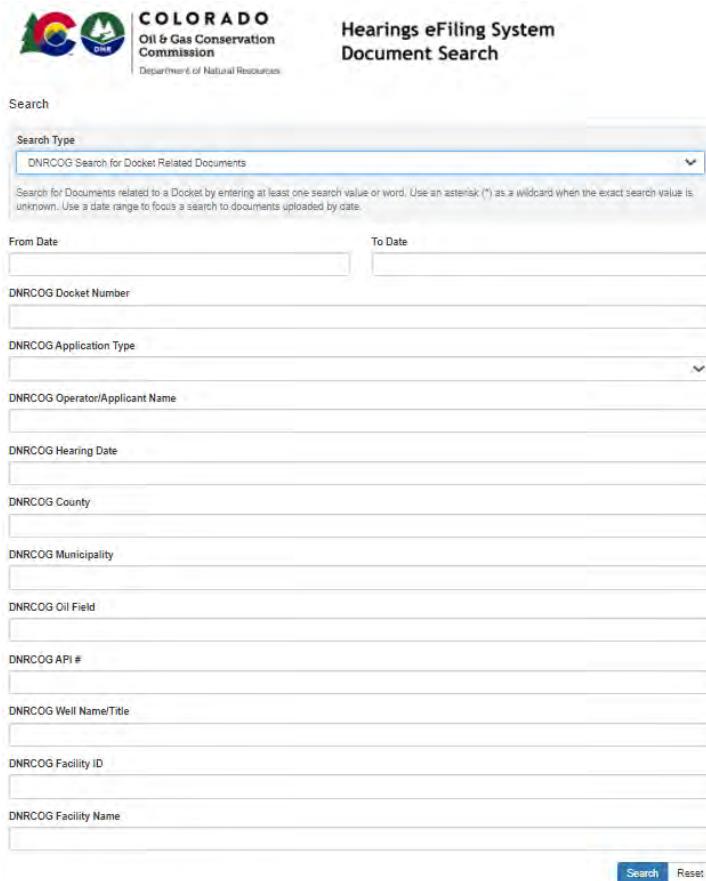
The screenshot shows the COGCC Commission Hearings page with the 'Hearings Schedule & Information' panel highlighted. It lists two hearings: 'January 06, 2021' and 'January 13, 2021'. The 'Public Tools' panel on the right contains a list of links, and a red arrow points to the 'Document Search' link, which is a blue button with white text.

The Document Search link will take you to the Hearings eFiling System Document Search user interface:



Click on the Search Type dropdown to access three different ways to search for information:

- For "DNRCOG New Applications" search type, enter the date range and click "Search". This search will show just the new matters initiated during the specified date range.
- For "DNRCOG New Documents", enter the date range and click "Search". This search will return all documents filed during the specified period.
- The most robust search type is "DNRCOG Search for Docket Related Documents" as a number of fields can be used to customize the search:



While any of the search fields may be used, specifying the Docket Number will provide all the documents associated with just that specific matter. Enter the nine digit Docket Number in the "DNRCOG Docket Number" field and click "Search". The following results example used the Financial Assurance Informational Docket, 210200013 docket number:

Search results are returned in a table that provides links to the related documents:

Results		
Date Stored	Document Name	Author
3/18/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/18/2021 - Confidential?: NO	TEASLEY@CC4CA.ORG
3/17/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/17/2021 - Confidential?: NO	NSTEINZOR@EARTHWORKS.ORG
3/17/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/17/2021 - Confidential?: NO	JANROSE212@YAHOO.COM
3/17/2021	DNRCOG Petition - Docket Number: 210200013 - Filed By: PETITIONER - Date Stored: 3/17/2021 - Confidential?: NO	JANROSE212@YAHOO.COM
3/17/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/17/2021 - Confidential?: NO	JANROSE212@YAHOO.COM
3/17/2021	DNRCOG Order - Hearing Officer - Order Regarding: PREHEARING - Docket Number: 210200013 - Filed By: INTERNAL HEARINGS - Date Stored: 3/17/2021 - Confidential?: NO	THOMASE@DNR.STATE.US
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Administrative Order by Consent - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MJBFOOTE@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM
3/16/2021	DNRCOG Public Comment - Docket Number: 210200013 - Filed By: PUBLIC COMMENTER - Date Stored: 3/16/2021 - Confidential?: NO	MATSURA.LAW@GMAIL.COM

Three columns of information associated with the document are returned: the date the document was stored, the document name containing document related information, and the document provider. Click on the column header to sort by that field. Documents may be viewed online or downloaded to the user's computer.



INFORMATION SHEET: PROCEDURAL STEPS FOR THE REVIEW OF OGDPs

(As required by COGCC Rule 303.e.(2).C)

Why am I receiving this information sheet?

Oil and gas operating companies (“Operators”) are required to obtain approval of an Oil and Gas Development Plan (“OGDP”) from the Colorado Oil and Gas Conservation Commission (“COGCC”) prior to undertaking any new operations such as drilling oil and gas wells or building oil and gas locations. When an Operator submits an OGDP application to the COGCC for consideration, and the application has been received and is deemed complete, COGCC staff begins a formal technical review of the application materials, and a public comment period starts.

COGCC has prepared this information sheet to inform the public of the procedural steps involved with the Director’s and Commission’s review of an OGDP, so that the public is informed and may participate in the review process if they choose. As part of the process, Operators must provide this information sheet to certain recipients, like yourself, that include mineral owners within the area of proposed development and all landowners, homeowners, commercial property owners, tenants, and other entities within 2,000 feet of an oil and gas location proposed by a pending OGDP application.

What is an Oil and Gas Development Plan (OGDP)?

An OGDP is an Operator’s plan to develop oil or gas resources (“minerals”) from one or more surface locations. Operators prepare an OGDP and associated application materials, consistent with the requirements of COGCC Rule 303, and submit the plan for approval through the Commission’s Hearings process. The application materials include a hearing application; one or more Form 2A, Oil and Gas Location Assessments; a Form 2B, Cumulative Impacts Data Identification; and a Form 2C, OGDP Certification. The application may also include a request for the establishment

of one or more Drilling and Spacing Units (“DSUs”). The OGDP, along with its associated supporting documents, will be heard at a public hearing where the Commission will make a final determination to approve or deny the OGDP application.

What are the procedural steps involved with the Director’s and Commission’s review of Oil and Gas Development Plans?

1. **OGDP application is submitted:** Operator/ Applicant submits a complete OGDP application with all supporting documents. The written portion of the application is submitted to the COGCC hearings unit via the eFilings system, and Forms 2A, 2B, and 2C are submitted to technical staff via the eForms system. (See Rules 303 & 304)
2. **OGDP application is received:** The COGCC hearings unit reviews the written hearing application, assigns a docket number for the OGDP, and provides public notice for the hearing. (See Rules 303 & 504)
3. **Completeness determination:** The COGCC technical staff and Director review the application materials for completeness. When deemed complete:
 - a. the OGDP application materials are posted on COGCC’s website;
 - b. the Operator provides notice (including this information sheet) to relevant persons;
 - c. the public comment period begins;
 - d. the formal consultation period commences as applicable (including relevant/ proximate local governments and other agencies such as Colorado Parks and Wildlife (“CPW”) or Colorado Department of Public Health and Environment (“CDPHE”)); and
 - e. COGCC staff begin their technical review of the OGDP components. (See Rule 303).

4. **Director's review of application (technical review):** COGCC technical staff conducts the technical review of all application materials to ensure compliance with COGCC Rules, ensure the protection of public health, safety, welfare, the environment, and wildlife resources, and to evaluate potential Cumulative Impacts. The technical review includes analysis and assessment of:
 - a. DSUs and protection of mineral owner's correlative rights;
 - b. proposed surface locations and alternative locations;
 - c. downhole and engineering considerations;
 - d. best management practices;
 - e. public comments and recommendations provided by consulting agencies;
 - f. financial assurance; and
 - g. the need for conditions of approval. (See Rule 306)
5. **Commission's consideration and final action (public hearing):** The Commission receives the Director's recommendation of the OGDP and begins review of the OGDP with support from the COGCC hearings unit. The review includes all supporting documents, written testimony, public comments, consulting agency recommendations, and Director's recommendation. The Commission considers the OGDP at a public hearing, which may include oral testimony provided during the hearing. The Commission makes a final determination and presents its findings in a written order based on the evidence in the record; the Commission's order to approve or deny the OGDP application is final. (See Rule 307)

Where can I get additional information?

For more information about the COGCC administrative hearing process and OGDPs, please refer to the COGCC website at <http://cogcc.state.co.us>. You may also contact the COGCC at dnr.ogcc@state.co.us or 303-894-2100. Please note, COGCC staff are not available to provide legal advice. COGCC recommends that you engage an attorney with knowledge of oil and gas matters to assist you with reviewing any offers you receive from an oil and gas operator or other person.

¹ Parties who receive this information sheet will not necessarily be included in the notice of the Director's recommendation. Parties who make a public comment on the Form 2A and include their email address will receive the notice of the Director's recommendation.



INFORMATION SHEET: PUBLIC COMMENTS

(As required by COGCC Rule 303.e.(2).D)

Purpose

This information sheet provides details on how to make public comments on an Oil and Gas Development Plan submitted to the Colorado Oil and Gas Conservation Commission via the Form 2A, Oil and Gas Location Assessment permit application.

Why am I receiving this Information Sheet?

You have received this Colorado Oil and Gas Conservation Commission (“COGCC”) information sheet because an oil and gas operator (“the Operator”) has submitted an application for an Oil and Gas Development Plan (“OGDP”), and that application is under review by the COGCC. Per COGCC Rule 303.e.(1), the Operator is required to provide this information to you within seven days of the application materials being posted on the COGCC website.

COGCC Rule 303.d requires the COGCC to open a formal “public comment period” upon posting the OGDP application to our website. This public comment period allows the public to review OGDP applications and their components (i.e., proposed Oil and Gas Locations), and provide comments on those pending permit applications.

How can I provide comments on pending permits in an OGDP?

Members of the public can access OGDP applications through the COGCC website to review permit information and provide comments. Public comments may be made directly on Form 2A, Oil and Gas Location Assessment permit applications (“Form 2A”) through the COGCC website.

1. Go to the COGCC website <https://cogcc.state.co.us>
2. On the green menu bar, click on the “Permits” page. This will take you to the “Drilling and Location Permits Search” tool for Pending Permits.



3. Under “Pending Permits”, find “Oil and Gas Location Assessment Permits (Form 2A)”. Select the county of interest from the dropdown menu and click “Go!”

Pending Permits (Filed ON or AFTER January 15th, 2021)

Oil & Gas Location Assessment Permits (Form 2A): Arapahoe

4. This will generate a table of pending applications and will indicate the status of the public comment period for each permit within the COGCC review process.
5. Scroll through the list of pending permits to find the one you would like to review. You may wish to use “ctrl + f” to search for a specific document number, operator name, or location name.
6. To view the submitted Form 2A and its associated attached documents, click the “Location Name” link for the permit application you wish to view.

Pending Location Permits - All Counties

[Back](#) [Export to Excel](#)

Doc Number (Public Comment Link)	Final day of Public Comment Period (Closes at Midnight)	Received	Location Name (Documents Link)	Status	Status Date
402165141	03/11/2021	01/26/2021	Brian Test 4	IN PROCESS	01/26/2021

7. To make a public comment on a specific permit application, click the “Doc Number” link of the permit on which you wish to comment. This will take you to the Public Comment portal.

Pending Location Permits - All Counties

[Back](#) [Export to Excel](#)

Doc Number (Public Comment Link)	Final day of Public Comment Period (Closes at Midnight)	Received	Location Name (Documents Link)	Status	Status Date
402165141	03/11/2021	01/26/2021	Brian Test 4	IN PROCESS	01/26/2021

8. In the Public Comment portal, you may review the Form 2A application including the PDF and all attachments.

Selected Well / Location:

Document Number	Form Type
402165141	02A COL

[Attachments](#) [PDF](#) [Make Comment](#)

9. To make a public comment, click the “Make Comment” button. A Form will open for you to provide your name, contact information, and your comment. Only the text in the Comment box will be made public; your contact information will be kept confidential by COGCC.

Please fill out the fields below in full to submit your comment.

Name: Email:
Address: Phone Number:
City: State: Zip:
Subject:
Comment:

10. Click the “Submit Comment” button when you are ready to submit your comment.
11. You may also view other public comments and read yours after it is posted by scrolling down on this page (see below about a delay in displaying comments).

How long do I have to submit a comment on a permit?

The Public Comment Period begins once the COGCC Director determines the OGDP application is complete and has been successfully submitted by the operator. The Director will approve the Form 2C, OGDP Certification form, and post the OGDP application on the website for public review.

In order to be considered by the Director and Commission during the review of the OGDP, public comments must be received as follows:

1. Within 30 days from the date that the Director posts the OGDP on the website, OR
2. Within 45 days if the OGDP includes any proposed Oil and Gas Locations within 2,000 feet of a Residential Building Unit, High Occupancy Building Unit, or School Facility within a Disproportionately Impacted Community.

The final day for public comments can be found in the list of all pending permits:

Pending Location Permits - All Counties					
Doc Number (Public Comment Link)	Final day of Public Comment Period (Closes at Midnight)	Received	Location Name (Documents Link)	Status	Status Date
402165141	03/11/2021	01/26/2021	Brian Test 4	IN PROCESS	01/26/2021

When the Public Comment Period closes, the date will revert to read “Comments Closed”. The link to the public comment portal will remain active, but comments will no longer be accepted. You will still be able to view any public comments submitted for pending permits.

The Director may extend or reopen the public comment period per Rule 303.g, for up to an additional 30 days for a proposed OGDP if the Director determines an extension or reopening is reasonable in order to obtain public input.

What happens to my comment?

Your comment will become part of the public record of the application and will be reviewed by the applicant,

COGCC staff, Director, and the Commission. COGCC staff may recommend permit conditions in response to comments. But, Staff does not routinely respond individually to comments; instead, COGCC staff will work directly with the applicant to address the site-specific concerns expressed.

Submitted comments may not be immediately visible; it may be a few days before you see your comments posted. This delay allows COGCC supervisory staff to screen for offensive language prior to publication.

What if I want to make my comment to the Commission?

COGCC Staff and the Director review every comment received on a Form 2A permit application. They review the site specific concerns against the totality of the application materials, including the alternative location analysis, cumulative impacts evaluation, and best management practices proposed by the applicant. When the Director makes a recommendation to the Commission to either approve or deny an OGDP, that recommendation will include the consideration of the public comments received.

In their review of an OGDP for a final determination at the administrative hearing, the Commission will have access to the entire record, including your public comment.

Can I remain anonymous?

Yes. Only the “Comment” portion of your submitted comment will be made publicly viewable. Your name and contact information will be kept confidential, and will only be used by COGCC staff to contact you if necessary in the course of permit application review. If you choose to include your name and contact information in the body of your comment text, it will be part of the public record.

Where can I get additional information?

The following links provide guidance and additional information on providing Public Comments.

COGCC Permits Page:

<https://cogcc.state.co.us/permits.html#/permits>

Numerous helpful guidance documents can be found at the link on the COGCC Permits Page:

<https://cogcc.state.co.us/permits2.html#/permitshelp>

Daily Activity Dashboard (DAD) is another useful tool and can be used to access the public comment portal as well: <https://cogcc.state.co.us/dashboard.html>



INFORMATION SHEET: HYDRAULIC FRACTURING TREATMENT

(As required by COGCC Rule 303.e.(2).E)

Why am I receiving this information sheet?

The Colorado Oil and Gas Conservation Commission (“COGCC”) prepared this information sheet to provide the public with information related to hydraulic fracturing. Pursuant to Commission Rule 303.e.(2).E, Operators¹ are required to provide this information sheet to mineral owners within the area of proposed development and all landowners, homeowners, commercial property owners, tenants, and other entities within 2,000 feet of a proposed oil and gas location.

What is hydraulic fracturing treatment, and why is it necessary?

Hydraulic fracturing treatment is the process of creating small cracks, or “fractures,” in the rocks of deep, underground geological formations that have oil and natural gas. The fractures enhance the flow of oil and gas from the formation to the oil and gas well where it flows or is pumped up the well to the production equipment located on the surface of the site.

The process of hydraulic fracturing has been used for decades in Colorado, dating back to the 1970s. Operators² continue to improve hydraulic fracturing, and it is now a standard practice used in almost all oil and gas wells in the state, and across much of the country. Hydraulic fracturing has made it possible to produce oil and gas from rock formations that did not often produce oil and gas in the early to middle part of the twentieth century.

What happens before hydraulic fracturing treatment?

The operator uses a drilling rig to drill a “surface hole” and set a steel pipe called “surface casing” in the hole. The surface casing may extend many hundreds of feet, sometimes more than 1,000

feet, underground. The operator places cement on the outside of the surface casing to seal and protect groundwater. The operator tests the surface casing with pressure, then a smaller “production hole” is drilled out the bottom of the surface casing. After completing a formation integrity test, the operator drills down to the geological formation containing oil and gas, usually many thousands of feet underground. The operator lowers a production casing into the production hole, and cement is used to make a seal above the deep oil and gas formation. The operator “completes” the well by placing holes, or “perforations” in the casing at the deep oil and gas formation, to allow oil and gas to flow into the well. The well is then ready for hydraulic fracturing treatment.

What happens during and after hydraulic fracturing treatment?

The operator performs the treatment by using high pressure water pumps to fracture the deep oil and gas rock formation. The pumps push fracturing fluids down the well and out through the perforations, into the oil and gas rock formation. The hydraulic fracturing fluids are mostly water and sand, with a small amount of chemical additives. The sand, also called “proppant,” remains in the fractures to help keep the fractures open allowing oil and gas to flow through the fractures to the perforations.

After hydraulic fracture treatment, the well is allowed to “flowback,” meaning hydraulic fracture fluids, oil, gas, and produced water from the formation flow through the perforations and up the well to the surface where the fluids are separated. The operator sells the oil and gas. Waste products, mostly water produced from the oil and gas formation and hydraulic fracture fluids, are captured and stored for proper treatment or disposal.

¹ “Operator” as defined in COGCC Rules

² Hereinafter, and only for the purpose of describing the hydraulic fracture treatment process, the term “operator” includes the operator itself and all contractors and service providers that the operator hires to perform work.



Overhead view of a multiple-well site with hydraulic fracturing equipment set up inside a sound wall

Common questions and answers about hydraulic fracturing treatment.

Q: How is an oil and gas well designed to be protective of public health, the environment, and wildlife resources?

A: COGCC engineering staff review all well permits to ensure that wells are lined with multiple layers of steel and cement sufficient to isolate groundwater from the deep oil and gas rock formations. The operator's wellbore design must meet COGCC wellbore isolation standards and rules in order to receive a permit to drill.

Surface casing extends from the ground surface to 50 feet or more below groundwater. Production casing is cemented to seal the oil and gas formation in the well and prevent flow between groundwater and the oil and gas formations. The operator performs a well survey, called a "cement bond log," to verify the cement placement around the production casing. Additionally, the operator pressure tests surface equipment and ensures that nearby, "offset" wells that are close enough for pressure communication in the oil and gas formation have properly-rated surface equipment or downhole plugs.

Q: Will hydraulic fracturing treatment cause problems with water wells?

A: Water well problems related to hydraulic fracturing in Colorado are rare, which is largely a result of COGCC's long-standing mission to protect Waters of the State of Colorado, including

groundwater. Most recently, the COGCC adopted new rules for wellbore isolation, effective November 2, 2020 to further strengthen this mandate.

Geologic factors in Colorado also serve to help prevent groundwater impacts. Often, many thousands of feet of confining rock layers separate shallow groundwater formations that are used for drinking water, livestock, and irrigation from deep oil and gas formations. In cases where an operator intends to perform a hydraulic fracture treatment at a depth of less than 2,000 feet underground, a geological and engineering evaluation is required prior to approving a drilling permit. In cases where deep groundwater is present, COGCC rules require additional cement in oil and gas wells to seal the deep groundwater formations.

Q: What is hydraulic fracture fluid?

A: The COGCC and regulatory agencies of other oil and gas producing states partner with FracFocus, a Chemical Disclosure Registry, that operators use to report hydraulic fracture fluid chemical data (<https://www.fracfocus.org/>). According to FracFocus, approximately 98% to 99% of the fracturing fluid volume in most wells is water and sand. The remaining portion is made up of chemical additives used to reduce friction during pumping and prevent corrosion of the steel casing. Biocide is used to kill bacteria in the water. Surfactants promote water flowback from the formation, up the well and into the oil and gas production equipment at the well site or a nearby "tank battery." Fracturing chemicals are similar to other industrial chemicals which must be handled properly. COGCC rules require that operators properly store and handle chemicals in a manner that protects operator's employees, the public, the environment, and wildlife.

COGCC rules require operators to publicly disclose the components and concentrations of fracturing chemicals for each well within 60 days of the hydraulic fracture treatment on the FracFocus website, which is searchable by county, operator, and well. The website also provides information on chemicals used and their purpose.

Q: How are hydraulic fracturing fluids managed on the well site?

A: Operators manage large volumes of drilling fluid, hydraulic fracturing fluid, and flowback during drilling and hydraulic fracturing treatment. Operators protect the public, environmental resources, and wildlife by implementing best management practices specified by permit conditions and COGCC rules for spill prevention.

After hydraulic fracturing treatment, fluids return to production equipment at the well site as flowback. These flowback fluids are considered oil and gas Exploration and Production Waste ("E&P Waste") that are recycled for other oil and gas operations, or are disposed of in accordance with state regulations. Marketable production fluids, including oil and gas, are separated and contained in tanks or vessels, or sent by pipeline to sales.

Q: What can neighbors expect to experience during hydraulic fracturing treatment?

A: The operator provides the COGCC and the local government a 48-hour notice before performing hydraulic fracturing treatment. As the operator mobilizes the hydraulic fracturing crews, water tanks are placed at the site. The operator transports water to the site for hydraulic fracturing fluid by pipeline or water trucks. Heavy equipment, such as sand haulers, pump trucks, blending units and a control van arrives and the equipment is connected to the well with high pressure piping. The operator pressure tests the equipment, then the hydraulic fracture treatment begins. The work can take several days to several weeks, depending on the number of wells on the well site and the number of treatment stages needed for each well. The equipment noise from engines, pumps, and vehicles will be noticeable during the work. Induced seismicity from hydraulic fracturing is very low intensity, too small to be noticed by people at the ground surface, and therefore man-made earthquakes are not a common occurrence in Colorado during hydraulic fracturing treatment operations.

Where can I get additional information?

FracFocus (www.fracfocus.org) contains detailed information on hydraulic fracturing, chemicals used, groundwater protection and how to find a well near you.

COGCC rules related to hydraulic fracturing:

- **Rule 308** Form 2, Application to Drill, Deepen, Re-Enter, or Recomplete, and Operate, Information Requirements
- **Rule 405.k** Notice of Intent to Conduct Hydraulic Fracturing Treatment
- **Rule 408** General Drilling Rules
- **Rule 411** Public Water System Protection
- **Rule 419** Bradenhead Monitoring, Testing, and Reporting
- **Rule 423 and 424** Noise and Lighting
- **Rule 437** Hydraulic Fracturing Chemical Additives
- **Rule 614** Coalbed Methane Wells
- **Rule 615** Groundwater Baseline Sampling and Monitoring
- **Rule 905** Management of E&P Waste
- **Rule 912** Spills and Releases (includes landowner notification requirements)

COGCC's rules are available as downloadable files at cogcc.state.co.us.