

## Kubeczko, Dave

---

**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 13, 2010 9:11 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Oxy USA WTP, Cascade Creek 697-15-01, NWNW Sec 15 T6S R97W, Garfield County, Form 2A #400049582 Review

Scan No 2033070      CORRESPONDENCE      2A#400049582

---

**From:** Joan\_Proulx@oxy.com [mailto:Joan\_Proulx@oxy.com]  
**Sent:** Friday, April 09, 2010 2:19 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Oxy USA WTP, Cascade Creek 697-15-01, NWNW Sec 15 T6S R97W, Garfield County, Form 2A #400049582 Review

Dave:

In response to Question 1, the disturbed area during construction is 6.5 acres and the reclamation area is 4.3 acres (which I missed on the reclamation plan plat).

Thank you for bringing this to my attention. Oxy concurs with the COAs.

Regards,

Joan

---

**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, April 09, 2010 1:33 PM  
**To:** Proulx, Joan M  
**Subject:** Oxy USA WTP, Cascade Creek 697-15-01, NWNW Sec 15 T6S R97W, Garfield County, Form 2A #400049582 Review

Joan,

I have been reviewing the Cascade Creek 697-15-01 **Form 2A** (#400049582). COGCC requests the following clarifications regarding the data Oxy USA has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Construction (Section 6):** The size of the disturbed area during construction (6.50 acres) and size of location after interim reclamation (6.50 acres) are the same. I would think that after interim reclamation, the disturbed area would be less. Can you please confirm what these sizes are. I can make the change if you send an email with this request.
2. **General:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
  - COA 9** - Reserve pit must be lined.
  - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.

**COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

**COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.

**COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

3. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within  $\frac{3}{4}$  Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

**COA 6** - All pits must be lined.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
707 Wapiti Court, Suite 204  
Rifle, CO 81650  
Phone: (970) 625-2497x5  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)



 *Please consider the environment before printing this e-mail*