

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, September 30, 2010 11:18 AM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A #400091896 Review

Scan No 2033427 CORRESPONDENCE 2A#400091896

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Monday, September 20, 2010 11:36 AM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A #400091896 Review

Dave:

In response to the items listed below:

1. Oxy agrees that the size of the disturbed area during construction may be as large as approximately 5 acres.
2. Oxy agrees with COA 4 and COA 5.
3. Oxy agrees to change the water resources to your finding.
- 4, 5. As described in the Comments section of the Form 2A, Oxy agrees to comply with the NTO dated June 12, 2008.

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, September 20, 2010 10:56 AM
To: Proulx, Joan M
Subject: Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A #400091896 Review

Joan,

I have been reviewing the Cascade Creek 609-33 Pad **Form 2A** (#400091896). COGCC requests the following clarifications regarding the data Oxy USA has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Construction (Section 6):** The size of the disturbed area during construction (1.50 acres) appears to be low based on the construction layout drawings. COGCC's review indicates that the total disturbed area, including the previously disturbed pad and access road, may be as large as approximately 5.10 acres. I can make the change if you send an email with this request, or if you think the total disturbed area is different, please confirm what the size should be.
2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 1221 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates an intermittent stream approximately 500 feet to the south. I can make the change if you send an email with this request. COGCC guidelines require designating all locations within close proximity to surface water (the exact

distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) a **sensitive area** and requiring the following conditions of approval (COAs):

COA 4 - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 400 feet bgs for a well located 56232 feet from the well pad. COGCC's review found a closer water well (Permit No. 32696-M-Cities Services Oil and Gas Corp, monitoring well) approximately 8606 feet to the northwest; with a total depth of 430 feet bgs and a depth to groundwater of 190 feet bgs. I believe this well is indicative of groundwater conditions in this area. I can make the change if you send an email with this request.
4. **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; therefore, this location will be designated a **sensitive area**. 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 (or any other pit used to contain/hold fluids) must be lined or a closed loop system must be implemented during drilling.
 - 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.
5. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Operator must comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ 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 (items 2, 4, and 5) to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 2, and 3) also need to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

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

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