

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, January 04, 2011 9:52 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Oxy USA WTP, Logan Trail 28-10 Off-Loading Facility, NWSE Sec 31 T7S R97W, Garfield County, Form 2A (#400110775) Review

Scan No 2033568      CORRESPONDENCE      2A#400110775

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**From:** [Joan Proulx@oxy.com](mailto:Joan.Proulx@oxy.com) [<mailto:Joan.Proulx@oxy.com>]  
**Sent:** Tuesday, January 04, 2011 9:02 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Oxy USA WTP, Logan Trail 28-10 Off-Loading Facility, NWSE Sec 31 T7S R97W, Garfield County, Form 2A (#400110775) Review

Dave:

Oxy concurs with attaching the COAs listed below to the Form 2A permit for the Logan Trail 28-10 Off-Loading Facility.

Thank you,

Joan

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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Saturday, January 01, 2011 12:58 PM  
**To:** Proulx, Joan M  
**Subject:** Oxy USA WTP, Logan Trail 28-10 Off-Loading Facility, NWSE Sec 31 T7S R97W, Garfield County, Form 2A (#400110775) Review

Joan,

I have been reviewing the Logan Trail 28-10 Off-Loading Facility **Form 2A** (#400110775). 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. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 311 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** and requiring the following conditions of approval (COAs):
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water.
  - COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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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