

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, January 12, 2011 9:51 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A (#400122073) Review; (previously submitted/approved Form 2A#400091896)

Scan No 2033587      CORRESPONDENCE      2A#400122073

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**From:** [Joan Proulx@oxy.com](mailto:Joan.Proulx@oxy.com) [<mailto:Joan.Proulx@oxy.com>]  
**Sent:** Wednesday, January 12, 2011 7:20 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A (#400122073) Review; (previously submitted/approved Form 2A#400091896)

Dave:

Oxy concurs with the COAs listed below (item 1 and item 2) for the 609-33 pad, Form 2A.

Thank you.

Joan

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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Tuesday, January 11, 2011 5:01 PM  
**To:** Proulx, Joan M  
**Subject:** Oxy USA WTP, Cascade Creek 609-33 Pad, NWSE Sec 9 T6S R97W, Garfield County, Form 2A (#400122073) Review; (previously submitted/approved Form 2A#400091896)

Joan,

I have been reviewing the Cascade Creek 609-33 Pad **Form 2A** (#400122073); previously submitted (9/14/2010), reviewed, and approved (10/21/2010) Form 2A (#400091896). COGCC would like to attach the following conditions of approval (COAs) (which were placed on the original permit) on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **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** (which Oxy has indicated on the Form 2A). 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - COA 9** - Any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) 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; 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. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**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.

2. **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  $\frac{3}{4}$  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 (items 1 and 2) 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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