

## Kubeczko, Dave

---

**From:** Kubeczko, Dave  
**Sent:** Thursday, March 31, 2011 5:49 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Oxy USA WTP, Cascade Creek 609-1 Pad, NWSW Sec 9 T6S R97W, Garfield County, Form 2A (#400143240) Review

Scan No 2033675      CORRESPONDENCE      2A#400143240

---

**From:** [Joan\\_Proulx@oxy.com](mailto:Joan_Proulx@oxy.com) [[mailto:Joan\\_Proulx@oxy.com](mailto:Joan_Proulx@oxy.com)]  
**Sent:** Monday, March 28, 2011 2:41 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Oxy USA WTP, Cascade Creek 609-1 Pad, NWSW Sec 9 T6S R97W, Garfield County, Form 2A (#400143240) Review

Dave:

Oxy concurs with the COAs listed below with the exception of the NTO COAs, because there are no additional drilling operations taking place on the 609-1 pad.

Thank you, and please let me know if you have further questions.

Regards,

Joan

---

**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, March 28, 2011 10:59 AM  
**To:** Proulx, Joan M  
**Subject:** Oxy USA WTP, Cascade Creek 609-1 Pad, NWSW Sec 9 T6S R97W, Garfield County, Form 2A (#400143240) Review

Joan,

I have been reviewing the Cascade Creek 609-1 Pad **Form 2A** (#400143240). COGCC would like to attach the following conditions of approval (COAs) based on the data and information Oxy USA has submitted on or attached to 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**. 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 or buried pipelines.
  - COA 9** - Any pit constructed to hold fluids (if built) must be lined.
  - 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 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

**COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

2. **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.

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**

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*