

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, July 05, 2011 1:54 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Noble Energy, Rulison 17M Pad, SWSW Sec 17 T7S R94W, Project Rulison, Garfield County, Form 2A #400174275 Review  
**Attachments:** Project Rulison\_Form 2A\_Conditions of Approval \_COAs\_\_Revised\_07052011.pdf

Scan No 2033902      CORRESPONDENCE      2A#400174275

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, July 05, 2011 12:31 PM  
**To:** [llindow@nobleenergyinc.com](mailto:llindow@nobleenergyinc.com)  
**Subject:** Noble Energy, Rulison 17M Pad, SWSW Sec 17 T7S R94W, Project Rulison, Garfield County, Form 2A #400174275 Review

Liz,

I have been reviewing the Rulison 17M Pad **Form 2A** (#400174275). I have attached the **revised** general set of Conditions of Approval (COAs) associated with the Project Rulison area. These COAs were attached to the original Form 2 (APD) permits for this pad. COGCC will attach 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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PROJECT RULISON COAs:

Comply with all DOE Office of Legacy Management requests for sampling and analysis of natural gas and other materials associated with drilling and production.

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.

Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment. 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.

Produced water from this location may not be transported to or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison SAP.

Drill solids and cuttings from this location may not be transported to, disposed of or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison SAP.

A closed loop mud system shall be utilized to ensure containment of all materials that have been in contact with downhole strata and fluids. All cuttings and fresh make up water storage pits shall be lined to ensure containment. Contour features, french drains and other stormwater bmps as necessary shall be employed to ensure site integrity.

No individual operator shall utilize more than one rig within one mile of the project Rulison blast site at any given time and no individual operator shall utilize more than two rigs within a three mile radius of the site at any given time. The total number of rigs allowed by all operators within three miles of the site shall be limited to five at any given time.

Operator shall comply with all provisions of the most recent COGCC approved revision of the Rulison sampling and analysis plan. In addition to the produced water sampling and analysis outlined in section 5.8 of the plan the operators shall also obtain and analyze produced water samples on wells described in the plan for constituents listed in the plan using the specified method where applicable.

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.

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.