

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, August 08, 2011 9:48 AM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP LP, Cascade Creek 604-12-13 Annex Pad, Lot 16 Sec 4 T6S R97W, Garfield County, Form 2A (#400188083) Review

Categories: Orange - Operator Correspondence

Scan No 2033956 CORRESPONDENCE 2A#400188083

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Thursday, August 04, 2011 9:49 AM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP LP, Cascade Creek 604-12-13 Annex Pad, Lot 16 Sec 4 T6S R97W, Garfield County, Form 2A (#400188083) Review

Dave:

Thank you for the clarification.

With the removal of COA 99, Oxy agrees with the seven remaining COAs listed on your original email for the 604-12-13 pad.

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, August 04, 2011 7:37 AM
To: Proulx, Joan M
Subject: RE: Oxy USA WTP LP, Cascade Creek 604-12-13 Annex Pad, Lot 16 Sec 4 T6S R97W, Garfield County, Form 2A (#400188083) Review

Joan,

The Roan Rim NTO placed an arbitrary ¾-mile boundary from the edge of the rim. The highly fractured surface Uinta Formation does not end at ¾-miles from the edge of the rim and is one of the primary reasons for the requirements within the NTO. The COAs placed on this permit are the same that have been placed on all permits on the Roan as far as 12 miles north of the rim on all operators. The geology, hydrology, and hydrogeology of the surface Uinta Formation, as well as surface topography, grade, soil types, vegetative cover, and other factors, dictate the COAs. COAs 5, 9, 23, 25, 38, and 39 are placed on most permits in the Piceance due to surface conditions and the types of facilities listed on the permit. Oxy's permit indicates that a drilling pit will be used. It must be lined. I will remove COA 99. Hope this clarifies COGCC's stance on Form 2A reviews and COA determinations. 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



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From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Wednesday, August 03, 2011 11:21 AM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP LP, Cascade Creek 604-12-13 Annex Pad, Lot 16 Sec 4 T6S R97W, Garfield County, Form 2A (#400188083) Review

Dave:

Oxy's upper management is questioning the validity of your request to add the COAs as listed below for the 604-12-13 pad. Their points are:

1. The 604-12-13 pad does not lie within the Roan Rim NTO, and lies 158' beyond the 3/4 mile NTO boundary buffer zone.
2. Oxy is using a closed loop system.
3. Oxy is now closing out pits within the allotted time frame, rather than extending the life of the pit as in past practices.

Please advise.

Thank you.

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, August 02, 2011 11:55 AM
To: Proulx, Joan M
Subject: Oxy USA WTP LP, Cascade Creek 604-12-13 Annex Pad, Lot 16 Sec 4 T6S R97W, Garfield County, Form 2A (#400188083) Review

Joan,

I have been reviewing the Cascade Creek 604-12-13 Annex Pad **Form 2A** (#400188083). 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. **General:** COGCC's review indicates that the well pad location is approximately 4118 feet to the east (4507 feet to the north) of the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Although this well pad location does not fall within the current Roan Rim NTO

boundaries, due to the highly fractured nature of the surface material in the area around the Roan Rim, this location will be designated a **sensitive area**; and 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; 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 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

COA 25 - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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.

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.

COA 99 - 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.

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
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