

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, January 06, 2012 11:22 AM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP LP, Shell 797-03A Pad, Tract 71 Sec 3 T7S R97W, Garfield County, Form 2A #400231789 Review

Categories: Orange - Operator Correspondence

Scan No 2034117 CORRESPONDENCE 2A#400231789

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Friday, January 06, 2012 11:13 AM
To: Kubeczko, Dave
Cc: Chris_Clark@oxy.com
Subject: RE: Oxy USA WTP LP, Shell 797-03A Pad, Tract 71 Sec 3 T7S R97W, Garfield County, Form 2A #400231789 Review

Dave:

In response to the proposed COAs listed below for the Shell 797-03A pad:

COA 44: Oxy agrees with the first sentence of this COA. Please strike from the second sentence the words, "...including enforcing established speed limits on private roads." Oxy has no authority to enforce speed limits on private roads; however, we do work with our contractors through safety meetings and stop work authority to work safely at all times, including driving safely and adherence to speed limits. Oxy has a posted speed limit of 20 MPH on roads.

COA 46: Oxy agrees with the second sentence of this COA. Please strike from the first sentence the words, "...the pad shall be constructed as quickly as possible and..." Oxy makes every effort to construct well pads as quickly as practicable and in a timely manner, consistent with safe work practices.

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

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, December 27, 2011 10:59 AM
To: Proulx, Joan M
Subject: Oxy USA WTP LP, Shell 797-03A Pad, Tract 71 Sec 3 T7S R97W, Garfield County, Form 2A #400231789 Review

Joan,

I have been reviewing the Shell 797-03A Pad **Form 2A** (#400231789). 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 immediately below 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 unconsolidated nature of the surface material in the area around and below 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 44 - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters. Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 46 - The surface soils and materials are moderately unconsolidated and the slopes to the east are very steep; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after well pad construction completion, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

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, 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. Under unforeseen upset conditions during flowback operations, operator may discharge flowback fluids directly into the pit, as needed (notice of intent to directly discharge into the pit must be sent to Dave Kubeczko; email dave.kubeczko@state.co.us).

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

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.

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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