

## Dave Kubeczko - DNR

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**From:** Kubeczko - DNR, Dave  
**Sent:** Monday, May 13, 2013 4:20 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** Fwd: WPX Energy Rocky Mountain LLC, Federal GM 32-4 Pad, SWNE Sec 4 T7S R96W, Garfield County, Form 2A (#400402051) Review

**Categories:** Operator Correspondence

**Scan No 2106600      CORRESPONDENCE      2A#400402051**

----- Forwarded message -----

**From:** **Rider, Kent** <[Kent.Rider@wpxenergy.com](mailto:Kent.Rider@wpxenergy.com)>

**Date:** **Mon, May 13, 2013 at 9:37 AM**

**Subject:** RE: WPX Energy Rocky Mountain LLC, Federal GM 32-4 Pad, SWNE Sec 4 T7S R96W, Garfield County, Form 2A (#400402051) Review

**To:** Dave Kubeczko - DNR <[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)>, "Davis, Gregory" <[Gregory.Davis@wpxenergy.com](mailto:Gregory.Davis@wpxenergy.com)>

Dave,

I think these look okay. We'll add surface water to our BWQ sampling visit on this well. We have not received BLM permits yet, so no COAs at this time.

Thanks,

**Kent Rider** | Environmental Supervisor

WPX ENERGY | 1058 County Rd 215, Parachute, CO 81635

O: (970) 623-8934 | C: (970) 250-7328 | [kent.rider@wpxenergy.com](mailto:kent.rider@wpxenergy.com)



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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Sunday, May 12, 2013 10:54 AM  
**To:** Davis, Gregory  
**Cc:** Rider, Kent

Greg,

I have been reviewing the Federal GM 32-4 Pad **Form 2A** (#400402051). COGCC would like to attach the following conditions of approval (COAs) based on the information and data WPX Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**General:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines

**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 28** - The location is in an area of moderate to high run-on/run-off potential; therefore 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 run-off.

**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, if drill cuttings are to remain/disposed of onsite, they must also meet the applicable standards of table 910-1.

**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, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

**COA 22** - Prior to drilling, operator shall collect surface water samples from Ripley Gulch to the south-southeast (one upgradient and one downgradient from the well pad location), if water is present. After 90 days, but less than 180 days of completion of the proposed wells a “post-completion” test shall be performed for the same analytical parameters listed below and repeated once between 60- and 72-months. If the wells are non-producing wells, then the 60- to 72-month sample will not be required. If no significant changes from the baseline have been identified after the 60- to 72-month sample, no further testing shall be required. Additional “post-completion” test(s) may be required if changes in water quality are identified during follow-up testing. At a minimum, the surface water samples will be analyze for the following parameters: pH, specific conductance, total dissolved solids (TDS), dissolved gases (methane, ethane, propane), alkalinity (total bicarbonate and carbonate as CaCO<sub>3</sub>), major anions (bromide, chloride, fluoride, sulfate, nitrate and nitrite as N, phosphorus), major cations (calcium, iron, magnesium, manganese, potassium, sodium), other elements (barium, boron, selenium and strontium), total petroleum hydrocarbons (TPH) and BTEX compounds (benzene, toluene, ethylbenzene and xylenes). Field observations such as odor, water color, sediment, bubbles, and effervescence shall also be documented. The location of the sampled Water Sources shall be surveyed in accordance with Rule 215. Copies of all test results described above shall be provided to the COGCC Director and the landowner where the water quality testing is located within three (3) months of collecting the samples used for the test. The analytical data and surveyed locations shall also be submitted to the Director in an electronic data deliverable format.

**Prior to pad construction or start of drill, is there is not sufficient water present in Ripley Gulch, operator shall provide documentation (dated photographs) to the COGCC via a Form 4 Sundry Notice, attention: Dave Kubeczko (email: [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) requesting relief from this COA.**

**Pipelines:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface pipelines (poly or steel) or permanent pipelines (poly or steel) are used during drilling and completion operations:

**COA 45** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service.

**COA 48** - Operator must implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located.

**COA 49** - Operator must routinely inspect the entire length of the surface pipeline to ensure integrity.

**COA 54** - Operator must ensure 110 percent secondary containment for any potential volume of fluids that may be released from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings.

**COA 55** - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

Based on the information provided in the Form 2A by WPX, COGCC will attach these COAs to the Form 2A permit, WPX does not need to respond, unless you have questions or concerns with details in this email. **In**

addition, could WPX Energy provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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

Western Colorado

Colorado Oil & Gas Conservation Commission

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