

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Friday, August 09, 2013 10:02 AM
To: dave.kubeczko@state.co.us
Subject: FW: WPX Energy Rocky Mountain LLC, Puckett GM 11-28 Pad, Lot 4 (NWNW) Sec 28 T6S R96W, Garfield County, Form 2A (#400441808) Review

Categories: Operator Correspondence

Scan No 2106711 CORRESPONDENCE 2A#400441808

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, August 09, 2013 8:59 AM
To: greg.j.davis@wpxenergy.com
Subject: WPX Energy Rocky Mountain LLC, Puckett GM 11-28 Pad, Lot 4 (NWNW) Sec 28 T6S R96W, Garfield County, Form 2A (#400441808) Review

Greg,

I have been reviewing the Puckett GM 11-28 Pad **Form 2A** (#400441808). COGCC would like to attach the following conditions of approval (COAs) based on the information and data WPX Energy Rocky Mountain (WPX) 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 close proximity to an intermittent drainage that leads to Parachute Creek; 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.

Groundwater Baseline Sampling:

COA 9 - Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING. The following water wells have been identified as acceptable locations:

- 1) Permit No. 1151891-Atlantic Richfield Company; household use well; TD - 60' bgs; SWL - 20' bgs; FM – alluvium; located approximately 2033' to the southwest (downgradient).
- 2) Permit No. 276697-Puckett Land Company; monitoring well; TD - ?' bgs; SWL - <30' bgs; FM – alluvium; located approximately 2482' to the south-southwest (downgradient).
- 3) Permit No. 185334-Puckett Land Company; stock well; TD - 120' bgs; SWL - 25' bgs; FM – alluvium/bedrock; located approximately 1846' to the south-southwest (downgradient).

Documented refusal to grant access by well owner or surface owner (for water well or spring sampling), the well no longer exists, or if no water wells or springs are located/identified within one-half mile, shall not constitute a violation of this COA.

Temporary Surface Pipelines: The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface pipelines (poly or steel) are used during operations at the well pad location or nearby well pads:

COA 11 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to testing surface poly or buried steel pipelines.

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. Operator shall conduct daily inspections of surface poly pipeline routes for leaks during active transfer of fluids. Inspections shall be conducted by viewing the length of the pipeline; operator will endeavor to minimize surface disturbance during pipeline monitoring. The operator shall maintain records of inspections, findings and repairs, if necessary, for the life of the pits.

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 sensitive area crossings, including, but not limited to 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 when you receive them. 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

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