Dave Kubeczko - DNR

From:	Dave Kubeczko - DNR
Sent:	Friday, December 27, 2013 1:52 PM
To:	dave.kubeczko@state.co.us
Subject:	FW: WPX Energy Rocky Mountain LLC, East Parachute Tank Farm Pad, SENE Sec 34 T6S R95W, Garfield County, Form 2A #400489013 Review
Categories:	Operator Correspondence

Scan No 2106832   CORRESPONDENCE   2A#400489013

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, December 27, 2013 1:51 PM
To: Haddock, Reed
Subject: WPX Energy Rocky Mountain LLC, East Parachute Tank Farm Pad, SENE Sec 34 T6S R95W, Garfield County, Form 2A #400489013 Review

Reed,

I have been reviewing the East Parachute Tank Farm Pad **Form 2A** (#400489013). COGCC would like to attach the following conditions of approval (COAs) based on the information and data WPX Energy Rocky Mountain LLC (WPX) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following conditions of approval (COAs) will apply:

> **COA 91** - Notify the COGCC 48 hours prior to start of tank farm pad reconstruction and start of operations using Form 42 (the appropriate COGCC individuals will automatically be email notified).

> **COA 9 -** Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING (as indicated on the Form 2A).

> **COA 32 -** Surface water samples from the unnamed stream (one upgradient and one downgradient to the facility location) located to the east-southeast of the facility (if water is present), shall be collected prior to the facility use and every 12 months (until facility closure) to evaluate potential impacts from tank facility operations. At a minimum, the surface water samples will be analyze for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

Construction: 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 or buried permanent pipelines.

> **COA 44 -** The existing access road will be maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

> **COA 76** - 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 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 59 -** All tanks and aboveground vessels containing fluids or chemicals used in the storage and transmission processes and operations must have secondary containment structures (which may include, but is not limited to, double-walled tanks). All secondary containment structures/areas must be lined. Operator must ensure 110 percent secondary containment for the largest structure containing fluids within each bermed area of the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

> **COA 6 -** Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.

COA 74 - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location and the facility shall comply with the operators SPCC Plan.

COA 29 - Within 30 calendar days of conclusion of the initial grading and earthwork and facility equipment placement, operator shall submit as-built drawings, including plan view and cross-sections (with perpendicular axes), prepared and stamped by a Professional Land Surveyor or Professional Engineer; including the facility pad, location of all equipment and secondary containment, stormwater BMPs, and the access road.

Material Handling and Spill Prevention: 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 45 - 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 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. 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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