

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, January 30, 2014 3:39 PM
To: dave.kubeczko@state.co.us
Subject: FW: Catamount Energy Partners LLC, Campbell 33-7-4 1H Pad, SWSW Sec 3 T33N R7W, La Plata County, Form 2A #400508494 Review

Categories: Operator Correspondence

Scan No 2106861 CORRESPONDENCE 2A#400508494

From: Nolan Redmond [mailto:nredmond@catamountep.com]
Sent: Monday, January 27, 2014 7:58 AM
To: Dave Kubeczko - DNR
Subject: RE: Catamount Energy Partners LLC, Campbell 33-7-4 1H Pad, SWSW Sec 3 T33N R7W, La Plata County, Form 2A #400508494 Review

Dave,

After reviewing the COAs we are ok with attaching them to the Form 2A. Let me know if you need anything else.

Thanks,

Nolan Redmond
Catamount Energy Partners
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Denver CO 80202
nredmond@catamountep.com
720-484-2347 Office
303-909-3587 Cell



From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, January 07, 2014 10:49 AM
To: Nolan Redmond
Subject: Catamount Energy Partners LLC, Campbell 33-7-4 1H Pad, SWSW Sec 3 T33N R7W, La Plata County, Form 2A #400508494 Review

Nolan,

I have been reviewing the Campbell 33-7-4 1H Pad **Form 2A** (#400508494). COGCC will attach the following conditions of approval (COAs) based on the data **Catamount** Energy Partners LLC (**Catamount**) 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 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 9 - Operator shall comply with Rule 608. COALBED METHANE WELLS. b. Water well sampling (as indicated on the Form 2A).

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 permanent buried pipelines. Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.

COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at frac tank water transfer/storage site during completion operations (as shown on the Construction Layout Drawings and the Location Drawing attachments); 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 location will be stabilized, inspected at regular intervals (every 14 days at a minimum during the construction phase and at least every 30 days during operations period), and maintained in good condition.

COA 28 - The location is in an area of moderate 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 44 - The access road will be constructed and 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 1 - Location is in a sensitive area due to shallow groundwater; therefore, either a closed loop system must be used (which operator has indicated on the Form 2A), or the drilling pit must be lined.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 25 - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment on each individual well pad 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 must be placed on the frac pad in an area with additional downgradient perimeter berming and must be constructed to be sufficiently impervious to contain any spilled or released material. The site will be manned 24/7 during completion operations and period visual checks will be conducted to provide overflow monitoring of the tanks during flowback.

COA 38 - The moisture content of any freshwater generated 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 the freshwater generated drill cuttings are to be onsite, they must also meet the applicable standards of table 910-1.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply to the Form 2A if any temporary/permanent surface or buried pipelines (poly or steel) are used during operations at the well pad location:

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 Southwest Colorado (Steve Labowskie; email steve.labowskie@state.co.us) 48 hours prior to testing surface poly/steel or buried poly/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.

COGCC would appreciate your concurrence with attaching the COGCC 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
Western Colorado**

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