

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Thursday, January 30, 2014 9:46 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: WPX Energy Rocky Mountain LLC, Clough RMV 205-20 Pad, SWNW Sec 20 T6S R94W, Garfield County, Form 2A #400505143 Review

**Categories:** Operator Correspondence

**Scan No 2106870      CORRESPONDENCE      2A#400505143**

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, January 27, 2014 8:59 AM  
**To:** Haddock, Reed  
**Cc:** Mestas, April  
**Subject:** RE: WPX Energy Rocky Mountain LLC, Clough RMV 205-20 Pad, SWNW Sec 20 T6S R94W, Garfield County, Form 2A #400505143 Review

Yes

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  
Northwest Area Office  
796 Megan Avenue, Suite 201  
Rifle, CO 81650  
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[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)

 *Please consider the environment before printing this e-mail*

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**From:** Haddock, Reed [mailto:[Reed.Haddock@wpxenergy.com](mailto:Reed.Haddock@wpxenergy.com)]  
**Sent:** Monday, January 27, 2014 7:54 AM  
**To:** Dave Kubeczko - DNR  
**Cc:** Mestas, April  
**Subject:** RE: WPX Energy Rocky Mountain LLC, Clough RMV 205-20 Pad, SWNW Sec 20 T6S R94W, Garfield County, Form 2A #400505143 Review

Dave:

Concerning COA 22, WPX submitted a water quality analysis of the Isles formation with the injection application; can we drop this COA? Reed

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**From:** Davis, Gregory  
**Sent:** Thursday, January 23, 2014 2:30 PM  
**To:** Mestas, April; Rider, Kent  
**Subject:** FW: WPX Energy Rocky Mountain LLC, Clough RMV 205-20 Pad, SWNW Sec 20 T6S R94W, Garfield County, Form 2A #400505143 Review

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**From:** Dave Kubeckzo - DNR [<mailto:dave.kubeckzo@state.co.us>]  
**Sent:** Thursday, January 23, 2014 1:49 PM  
**To:** Davis, Gregory  
**Cc:** Neifert-Kraiser, Angela  
**Subject:** WPX Energy Rocky Mountain LLC, Clough RMV 205-20 Pad, SWNW Sec 20 T6S R94W, Garfield County, Form 2A #400505143 Review

Greg,

I have been reviewing the WPX Energy Rocky Mountain LLC (WPX), Clough RMV 205-20 Pad **Form 2A** (#400505143). COGCC would like to attach the following conditions of approval (COAs) based on the information and data 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 pad reconstruction, 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** - As required for Groundwater Baseline Sampling; Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING.

**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 23** - Operator must ensure 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 48** - Operator must submit an as-built drawing (plan view and cross-sections) of the SWD injection well pad and associated equipment within 30 calendar days of construction.

**COA 46** - Operator will use qualified containment devices for all appropriate chemicals/hazardous materials used onsite during the operation of the injection well.

**COA 41** - All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure a minimum of 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 51** - Operator shall equip and maintain on all tanks an electronic level monitoring device.

**COA 52** - Operator shall install a steel containment ring around tank batteries to provide secondary containment and install a synthetic liner that underlies the entire battery and is keyed into the top of the containment ring.

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

**COA 38** - The moisture content of any drill cuttings in a cuttings 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 2** - Approval of this Form 2A does not authorize operator the right to inject. Authorization to inject into the selected Formation(s) requires approval of both the Form 31 and the Form 33.

**COA 22** - Before hydraulic stimulation of the well, or operating the well if not hydraulically stimulated, operator shall collect a groundwater sample from the Isles Formation and analyze for total dissolved solids (TDS); submit laboratory analytical results to [bob.koehler@state.co.us](mailto:bob.koehler@state.co.us) and [arthur.koelspell@state.co.us](mailto:arthur.koelspell@state.co.us).

**COA 25** - If the well is to be hydraulically stimulated, 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.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface or buried permanent 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](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to testing surface 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.

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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