

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, January 30, 2014 10:28 PM
To: dave.kubeczko@state.co.us
Subject: FW: URSA Operating Company LLC, Burkle Cuttings Staging Area Pad, NWSE Sec 16 T6S R92W, Garfield County_Form 2A#400519239 Review

Categories: Operator Correspondence

Scan No 2106875 CORRESPONDENCE 2A#400519239

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Monday, January 13, 2014 4:38 PM
To: Rob Bleil
Subject: URSA Operating Company LLC, Burkle Cuttings Staging Area Pad, NWSE Sec 16 T6S R92W, Garfield County_Form 2A#400519239 Review

Rob,

I have been reviewing the Burkle Cuttings Staging Area Pad **Form 2A** (#400519239). COGCC would like to attach the following conditions of approval (COAs) based on the information and data URSA Operating Company LLC (URSA) 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 cuttings pad construction and prior to transport of cuttings to this location and placement activities using Form 42 (the appropriate COGCC individuals will automatically be email notified).

COA 67 - Approval from the COGCC must be obtained via Sundry Notice Form 4 (Form 4) from EACH well pad or location that cuttings are generated prior to transporting to the Burckle Cuttings Staging Area. The information must be obtained and submitted to the COGCC on an electronic Form 4 for approval.

Location of Cuttings Generation (well pad where cuttings were generated from)

Estimated dates of Cuttings Transport

Volume of Cuttings

Intended Use

Raw Cuttings Analytical Results (off the shaker).

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

COA 23 - Operator must ensure containment at cuttings trench site during 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.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply:

COA 68 - All materials brought to this location that exceed the requirements in Table 910-1 will be placed in an area of the site that is completely segregated from materials that meet the requirements in Table 910-1. This area must be lined and bermed and appropriate BMPs need to be in place during the entire operational lifetime (no more than three years from date of start of construction. Sufficient 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 runoff.

COA 47 - The area where cuttings that exceed the requirements of Table 910-1 will be stored/treated/amended must be constructed to be sufficiently impervious to contain any spill or release of material or any accumulations of fluids.

COA 38 - The moisture content of any drill cuttings placed in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

Based on the information provided in the Form 2A by URSA, COGCC will attach these COAs to the Form 2A permit (these COAs reflect information in the Waste Management Plan and are consistent with COAs for other operator's Cuttings Management Areas in the Piceance. URSA does not need to respond, unless you have questions or concerns with details in this email. If you have any questions regarding this email, 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
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us

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