

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Monday, March 10, 2014 11:22 AM
To: dave.kubeczko@state.co.us
Subject: FW: WPX Energy Rocky Mountain LLC, Starkey Cuttings Trench Pad, NENE Sec 32 T6S R96W, Garfield County, Form 2A#400549476 Review

Categories: Operator Correspondence

Scan No 2106949 CORRESPONDENCE 2A#400549476

From: Haddock, Reed [mailto:Reed.Haddock@wpxenergy.com]
Sent: Thursday, March 06, 2014 3:13 PM
To: Dave Kubeczko - DNR
Subject: RE: WPX Energy Rocky Mountain LLC, Starkey Cuttings Trench Pad, NENE Sec 32 T6S R96W, Garfield County, Form 2A#400549476 Review

Dave: WPX is fine with these COAs. Reed

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Thursday, March 06, 2014 10:16 AM
To: Haddock, Reed
Subject: WPX Energy Rocky Mountain LLC, Starkey Cuttings Trench Pad, NENE Sec 32 T6S R96W, Garfield County, Form 2A#400549476 Review

Reed,

I have been reviewing the Starkey Cuttings Trench Pad **Form 2A** (#400549476). 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 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 - Operator must submit a Materials Management Plan (MMP) via a Form 4 Sundry to the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) for approval prior to transporting cuttings from other well pads to this location. This Sundry should include a list of all proposed locations where cuttings will be sent from to this cuttings management location. The MMP must describe how the operator intends to comply with Rule 907; in particular, describe the operator's plans for handling the cuttings and bentonite and exceed the requirements of Table 910-1. This plan shall also describe how the operator will profile, track, document placement of each material waste stream from each well/pad.

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

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 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 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 WPX, COGCC will attach these COAs to the Form 2A permit (these COAs are consistent with COAs for other operator's Cuttings Management Areas in the Piceance). WPX 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

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