

## Dave Kubeczko - DNR

---

**From:** Dave Kubeczko - DNR  
**Sent:** Monday, March 10, 2014 11:33 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: OXY USA WTP LP, Cascade Creek 697-15-54 Pad, SWSE Sec 15 T6S R97W, Garfield County, Form 2A#400556865 Review  
**Attachments:** Scanned from Xerox-OXY .pdf  
**Categories:** Operator Correspondence

Scan No 2106950      CORRESPONDENCE      2A#400556865

---

**From:** [Joan Proulx@oxy.com](mailto:Joan_Proulx@oxy.com) [mailto:[Joan\\_Proulx@oxy.com](mailto:Joan_Proulx@oxy.com)]  
**Sent:** Thursday, March 06, 2014 12:49 PM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Subject:** RE: OXY USA WTP LP, Cascade Creek 697-15-54 Pad, SWSE Sec 15 T6S R97W, Garfield County, Form 2A#400556865 Review

Dave:

OXY agrees with the COAs as outlined below for the 697-15-54 pad.  
Also, attached are the Construction Layout Drawings as requested.

Regards,

Joan

---

**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, March 06, 2014 9:42 AM  
**To:** Proulx, Joan M  
**Subject:** OXY USA WTP LP, Cascade Creek 697-15-54 Pad, SWSE Sec 15 T6S R97W, Garfield County, Form 2A#400556865 Review

Joan,

I have been reviewing the Cascade Creek 697-15-54 Pad **Form 2A** (#400556865). COGCC would like **Construction Layout Drawings (as outlined below)**, and would like to attach the following additional conditions of approval (COAs) based on the information and data OXY USA WTP LP (Oxy) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Rule 303.d.(3).I:** If the Oil and Gas Location disturbance is to occur on lands with a slope ten percent (10%) or greater (**COGCC's review indicates that the slope is approximately 13 percent**), or one (1) foot of elevation gain or more in ten (10) foot distance, then the following shall be required:

- i. Construction layout drawing (construction and operation); and
- ii. Location cross-section plot (construction and operation).

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

**COA 91** - Notify the COGCC 48 hours prior to pad reconstruction/regrading (if necessary), 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).

In addition, this location has been designated a “sensitive area” due to potential shallow groundwater (36’ bgs from previous monitoring well located 1100’ to the southeast) and highly fractured and weathered bedrock on the Roan Rim.

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

**COA 30** - Operator will comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County - Pit Design, Construction, and Monitoring Requirements.

**COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.

**COA 44** - The 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.

**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 before the fluids can be placed into any pipeline or storage vessel 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 constructed to be sufficiently impervious to contain any spilled or released material and with additional downgradient perimeter berming.

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

**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.

Based on the information provided in the Form 2A by Oxy, COGCC will attach these COAs to the Form 2A permit, Oxy 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**

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](mailto:dave.kubeczko@state.co.us)

 Please consider the environment before printing this e-mail