

STATE OF
COLORADO

Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Mojack 28-C Pad, Form 2A Doc # 400599841 and related 2s

1 message

Deranleau - DNR, Greg <greg.deranleau@state.co.us>

Fri, Jul 4, 2014 at 6:11 PM

To: regulatroy@petro-fs.com

Cc: Doug Andrews <doug.andrews@state.co.us>, Sarah Freeman - DNR <sarah.freeman@state.co.us>, Jane Stanczyk <jane.stanczyk@state.co.us>, Rick Allison <rick.allison@state.co.us>

Jennifer,

I am conducting a final review for Director's approval of the referenced Form 2A. The Drilling Waste Management had errors that required correction:

1. Although you indicated that **Fluids** disposal would be Offsite through an "Other" described method, the method described should be considered "Land Application" as a soil amendment at the listed Land Application Site (Facility ID 435839), based on the information contained in the waste management plan submitted for that site. I have changed the cuttings disposal method accordingly.
2. Although you indicated that **Cuttings** disposal would be Offsite through an "Other" described method, the method described should be considered "Beneficial Reuse" as a soil amendment at the listed Land Application Site (Facility ID 435839), based on the information contained in the waste management plan submitted for that site. I have changed the cuttings disposal method accordingly.
3. You have indicated that a beneficial reuse or land application plan has not been submitted. However, following a January 7, 2014 inspection of the Land Application Site (Facility ID 435839) by COGCC, Bayswater did submit the necessary documentation per Rule 907.a.(3). The waste management plan provided supports this information. Therefore the answer has been corrected to "YES".
4. As stated in your "Other Disposal Description," the Reuse Facility ID should be indicated as 435839. I have made the change.

As a result of confusion regarding the Fluids and Cuttings for this Oil and Gas Location, I am also adding the following condition of approval (COA) to this Form 2A: **"Notify COGCC via Form 42 prior to transporting Drilling Waste offsite."** This notice will be automatically provided to COGCC OGLA Specialist, who will notify COGCC regional Environmental Protection Specialist.

Form 2A as submitted:

DRILLING WASTE MANAGEMENT PROGRAM	
Drilling Fluids Disposal:	OFFSITE
Drilling Fluids Disposal Method:	Other (describe below)
Cutting Disposal:	OFFSITE
Cuttings Disposal Method:	Other (describe below)
Other Disposal Description:	
Reeves Mud Field COGCC Facility 435839 will be used for offsite disposal.	
Beneficial reuse or land application plan submitted? NO	
Reuse Facility ID:	or Document Number:
Centralized E&P Waste Management Facility ID, if applicable:	

Form 2A as approved:

DRILLING WASTE MANAGEMENT PROGRAM			
Drilling Fluids Disposal:	OFFSITE	Drilling Fluids Disposal Method:	Land application
Cutting Disposal:	OFFSITE	Cuttings Disposal Method:	Beneficial reuse
Other Disposal Description:			
Reeves Mud Field COGCC Facility 435839 will be used for offsite disposal.			
Beneficial reuse or land application plan submitted? YES			
Reuse Facility ID: 435839		or Document Number:	
Centralized E&P Waste Management Facility ID, if applicable:			

The very unfortunate thing is that you have submitted this Form 2A and 16 APDs (Form 2s) with the same erroneous information. All documents have been changed accordingly:

<input type="checkbox"/>	400599841	02A	rows: 16	BAYSWATER EXPLORATION AND ...	WELD	Mojack 28-C Pad	NWNE 28 7N 64W
	400599828	[02]	- [IN PROCESS]				
	400599877	[02]	- [IN PROCESS]				
	400599878	[02]	- [IN PROCESS]				
	400599879	[02]	- [IN PROCESS]				
	400599880	[02]	- [IN PROCESS]				
	400599882	[02]	- [IN PROCESS]				
	400599883	[02]	- [IN PROCESS]				
	400599884	[02]	- [IN PROCESS]				
	400599886	[02]	- [IN PROCESS]				
	400599887	[02]	- [IN PROCESS]				
	400599888	[02]	- [IN PROCESS]				
	400599889	[02]	- [IN PROCESS]				
	400599890	[02]	- [IN PROCESS]				
	400599895	[02]	- [IN PROCESS]				
	400599896	[02]	- [IN PROCESS]				
	400599897	[02]	- [IN PROCESS]				

The following comment was added to the Form 2A:

"Made changes to Drilling Waste Management Program on this Form 2A and ALL related Form 2s; operator notified."

The following comment was added to all of the Form 2s:

"Made changes to Drilling Waste Management Program on this Form 2 and the related Form 2A; operator notified."

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Greg Deranleau

Environmental Manager



7/4/2014

State.co.us Executive Branch Mail - Mojack 28-C Pad, Form 2A Doc # 400599841 and related 2s

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