

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, October 28, 2014 11:14 AM
To: dave.kubeczko@state.co.us
Subject: FW: WPX Energy Rocky Mountain LLC, Form 2A Condition of Approval (COA) 54 Revisions_10232014

Categories: Operator Correspondence

Scan No	CORRESPONDENCE	2A#s	400546899
2107122			400568334
			400625657
			400631623
			400639719
			400654306
			400661823
			400662749
			400678094
			400661753
			400698794
			400673597
			400623785
			400673596
			400661709

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Thursday, October 23, 2014 9:14 AM
To: Blaney, Karolina
Cc: Mestas, April; Haddock, Reed
Subject: RE: COA 54

Your edits have been incorporated into COA 54 for all current, "IN PROCESS" Form 2As. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

From: Blaney, Karolina [mailto:Karolina.Blaney@wpxenergy.com]
Sent: Thursday, October 23, 2014 8:48 AM
To: Dave Kubeczko - DNR
Cc: Mestas, April; Haddock, Reed
Subject: RE: COA 54

Dave,
I made some changes to your changes. It is WPX #1 priority (along with safety) to prevent spills from occurring and from impacting drainages, surface and groundwater but we cannot ensure that it will never happen. I hope you're OK with my proposed changes.
Thank you,

COA 54 - Operator must ensure **will implement BMPs necessary to mitigate a potential for a release of fluids to impact** streams, intermittent streams, ditches, and drainage crossings. For these crossings: **if poly pipe is used on the surface**, operator will ensure appropriate containment by either installing over-sized pipe "sleeves"

which extend the length of the crossing and beyond to a distance deemed adequate to capture (catchment basins) and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; installing over-sized pipe "sleeves" which extend the length of the crossing and installing shut off valves on either side of crossing instead of catchment basins; **or develop an alternative means for containment. For all other pipeline materials, operator must ensure will implement BMPs necessary to mitigate a potential for E&P fluids not to reach groundwater or flowing surface water.**

Karolina Blaney

Environmental Specialist

WPX Energy

Office: (970) 683-2295

Cell: (970) 589-0743

Fax: (970) 285-9573

karolina.blaney@wpxenergy.com

From: Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]

Sent: Wednesday, October 22, 2014 3:33 PM

To: Blaney, Karolina

Cc: Mestas, April; Haddock, Reed

Subject: RE: COA 54

See change below:

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 | www.colorado.gov/cogcc

Please consider the environment before printing this e-mail

From: Blaney, Karolina [<mailto:Karolina.Blaney@wpxenergy.com>]

Sent: Wednesday, October 22, 2014 3:18 PM

To: Dave Kubeczko - DNR

Cc: Mestas, April; Haddock, Reed

Subject: RE: COA 54

Dave,

I made a mistake in my email below. We pressure test our lines to 9500 psi and not 95000 psi... minor difference ☺.

Thanks,

Karolina Blaney

Environmental Specialist

WPX Energy

Office: (970) 683-2295

Cell: (970) 589-0743

Fax: (970) 285-9573

karolina.blaney@wpxenergy.com

From: Blaney, Karolina

Sent: Wednesday, October 22, 2014 3:11 PM

To: Dave Kubeczko - DNR

Cc: Mestas, April; Haddock, Reed

Subject: COA 54

Dave,

Is it possible to make the COA 54 more detailed and clarify that it is applicable to the poly lines only? Our steel frac lines are pressure tested to 95000 psi when installed and tested to 1000psi over max treating pressure before each frac stage. The frac lines are 4-1/2" P-110 casing with a 4" ID; the wall thickness is 1/4". Installation of sleeves on the steel frac lines will increase a potential for corrosion which will have an opposite result to than the intent of this COA. Also, installation of valves on each side of a drainage will create weak points and the potential to have failures or manipulation when the lines are in use. It is safer and more responsible to leave the valves out.

COA 54 - Operator must ensure no release of fluids at all stream, intermittent stream, ditch, and drainage crossings. For these crossings: **if poly pipe is used on the surface**, operator will ensure appropriate containment by either installing over-sized pipe "sleeves" which extend the length of the crossing and beyond to a distance deemed adequate to capture (catchment basins) and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; installing over-sized pipe "sleeves" which extend the length of the crossing and installing shut off valves on either side of crossing instead of catchment basins; **or develop an alternative means for containment. For all other pipeline materials, operator must ensure that any release of E&P fluids not reach groundwater or flowing surface water.**

Please let me know if you have any questions or suggestions.

Thank you,

Karolina Blaney

Environmental Specialist

WPX Energy

Office: (970) 683-2295

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Fax: (970) 285-9573

karolina.blaney@wpxenergy.com

