



DEPARTMENT OF NATURAL RESOURCES
 Roy Romer, Governor
 1120 Lincoln St., Suite 801
 Denver, CO 80203
 Phone: (303) 894-2100
 FAX: (303) 894-2109

July 5, 1995

Ms. Joi Inbody
 Chevron USA
 100 Chevron Road
 Rangely, CO 81648

Subject: Variance Request for Workover Pits at the Rangely Field

This letter is in response to your request to allow unlined workover pits at the Rangely Field. The COGCC authorizes a waiver from the requirements of Rule 905.b. for the workover pits (as described below) used in the Rangely Field by Chevron. This waiver is based on Chevron's demonstration that no significant adverse environmental impact is caused by the use of these pits. The basis for this conclusion follows.

Regulatory Determination:

The rules governing pits have changed as of July 1, 1995. Under the new rules, the workover pit is included in the category of Special Purpose Pits. Usual requirements for workover pits are stated in Rule 905 b., *Additional requirements for special purpose pits*, which requires a lining for workover pits. The COGCC considers Chevron's "request for variance" to be a waiver request under Rule 905.c. The COGCC *may waive the usual requirements for lining in Rule 905.b. upon demonstration by the operator that the unlined special purpose pit will cause no significant adverse environmental impact by such methods as incorporating the use of points of compliance.*

Description of Pit Operations:

The workover pits that are the topic of this waiver are described in Chevron's letter of 10/20/94 (attached). As described, these workover pits are not used to contain stimulation fluids, but only cleanout material circulated out of the well with brine water.

The pit closure method is also described in the attached letter. Final reclamation of the pit areas will occur when the wells are plugged and abandoned.

Demonstration of No Significant Adverse Environmental Impact:

The Rangely Field is determined to be outside a Sensitive Area, so there is less risk of potential environmental impact. In particular, the depth to groundwater is typically greater than 2000 ft, and the soil/hydrologic material is of low hydraulic conductivity.

Chevron took soil samples from the workover pits and analyzed them for metals and hydrocarbons which could be deposited from the workover activity, and remain in the soils after pit closure. The sample results attached show the metals and hydrocarbons to be below the COGCC closure standards. Based on this data, the waste material which remains in the soil does not appear to cause a significant adverse environmental impact.

If you have further questions or concerns about this matter, contact Robin L. Reade of the COGCC environmental staff.

Sincerely,



Rich Griebing, Director

attachments:

Chevron's letter of October 20, 1994

Chevron's letter of January 11, 1995, including
soil sample analyses

cc: Tricia Beaver, COGCC Mgr Environmental Affairs
Robin Reade, COGCC Environmental Staff
Jamie Adkins, COGCC Field Engineer



STATE OF
COLORADO

**OIL &
GAS**

CONSERVATION COMMISSION

len-tyl - example of variance request
Comments or suggestions? R

DEPARTMENT OF NATURAL RESOURCES

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I like to
see the
approval in the
1st sentence
and subject line

July 5, 1995

Ms. Joi Inbody
Chevron USA
100 Chevron Road
Rangely, CO 81648

Subject: *Approval of* Variance Request for W

This letter is in response to your request for a waiver from the Rangely Field. The COGCC authorizes a waiver from the Rangely Field for the workover pits (as described below) used in the Rangely Field by Chevron. This waiver is based on Chevron's demonstration that no significant adverse environmental impact is caused by the use of these pits. The basis for this conclusion follows.

Regulatory Determination:

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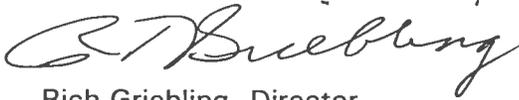
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Sincerely,



Rich Griebling, Director

attachments:

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Chevron's letter of January 11, 1995, including
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cc: Tricia Beaver, COGCC Mgr Environmental Affairs
Robin Reade, COGCC Environmental Staff
Jamie Adkins, COGCC Field Engineer



DRAFT
- review by TB.
- looks good!

TB - for review
- Robin
DEPARTMENT OF NATURAL RESOURCES
Roy Romer, Governor
1120 Lincoln St., Suite 801
Denver, CO 80203
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how quickly? who's signature?

July 5, 1995

Ms. Joi Inbody
Chevron USA
100 Chevron Road
Rangely, CO 81648

Subject: Variance Request for Workover Pits at the Rangely Field

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Description of Pit Operations:

The workover pits that are the topic of this waiver are described in Chevron's letter of 10/20/94 (attached). As described, these workover pits are not used to contain workover fluids, but only cleanout material circulated out of the well with water.

The pit closure method is also described in the attached letter. Final reclamation of the pit areas will occur when the wells are plugged and abandoned.

Demonstration of No Significant Adverse Environmental Impact:

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Sincerely,

(Rich Griebling, Director) or Brian

attachments:

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Chevron's letter of January 11, 1995, including
soil sample analyses

cc: Tricia Beaver, COGCC Mgr Environmental Affairs
Robin Reade, COGCC Environmental Staff
Jamie Adkins, COGCC Field Engineer



Rocky Mountain Profit Center

100 Chevron Road, Rangely, CO 81648

(970) 675-3700 (Office)

(970) 675-3800 (Panafax)
CTN numbers are the same.

(970) 675-3700 (Confirm)

SENT TO: Robin Reade
COGCC

FAX: (303) 894-2109

PHONE: (303) 894-2100 x112

FROM: Joi Inbody
Chevron

PHONE: (970) 675-3737

TOTAL NUMBER OF PAGES BEING SENT (including this one) 2

NOTE: _____

FINAL DRAFT TO RG FOR SIGN! 7/27

July 5, 1995

Ms. Joi Inbody
Chevron USA
100 Chevron Road
Rangely, CO 81648

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Description of Pit Operations:

The workover pits that are the topic of this waiver are described in Chevron's letter of 10/20/94 (attached). As described, these workover pits are not used to contain workover fluids, but only cleanout material circulated out of the well with water. ^{stimulation}

The pit closure method is also described in the attached letter. Final reclamation of the pit areas will occur when the wells are plugged and abandoned. ^{brine}

Demonstration of No Significant Adverse Environmental Impact:

The Rangely Field is determined to be outside a Sensitive Area, so there is less risk of potential environmental impact. In particular, the depth to groundwater is typically greater than 2000 ft, and the soil/hydrologic material is of low hydraulic conductivity.

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