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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.

DEPARTMENT OF NATURAL RESOURCES. James S. Lochhead, Executive Director

COGCC COMMISSION: Caroline Blackwell, Allan Heinle, Bruce Johnson, Logan MacMillian, Mike Matheson, Claudia Rebne, Marla Williams

COGCC STAFF: Richard T. Griebing, Director, Brian J. Macke, Deputy Director, Morris Bell, Manager of Engineering

Patricia C. Beaver, Manager, Environmental & Commission Affairs, Marnan Peacock, Manager of Information

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Rich Griebeling".

Rich Griebeling, 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

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 letter dated July 1, 1995, regarding the Rangely Field. The COGCC authorizes a waiver of the usual requirements for 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.*

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A handwritten signature in cursive script, appearing to read "Rich Griebeling".

Rich Griebeling, Director

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

DRAFT
- review by TB.
- looks good!

how quickly? who's signature?

July 5, 1995

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

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Description of Pit Operations:

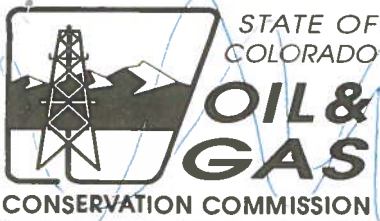
The workover pits that are the topic of this waiver are described in Chevron's letter of 10/20/94 (attached). As described, these workover pits are not used to contain workover fluids, but only cleanout material circulated out of the well with water.

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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Roy Romer, Governor
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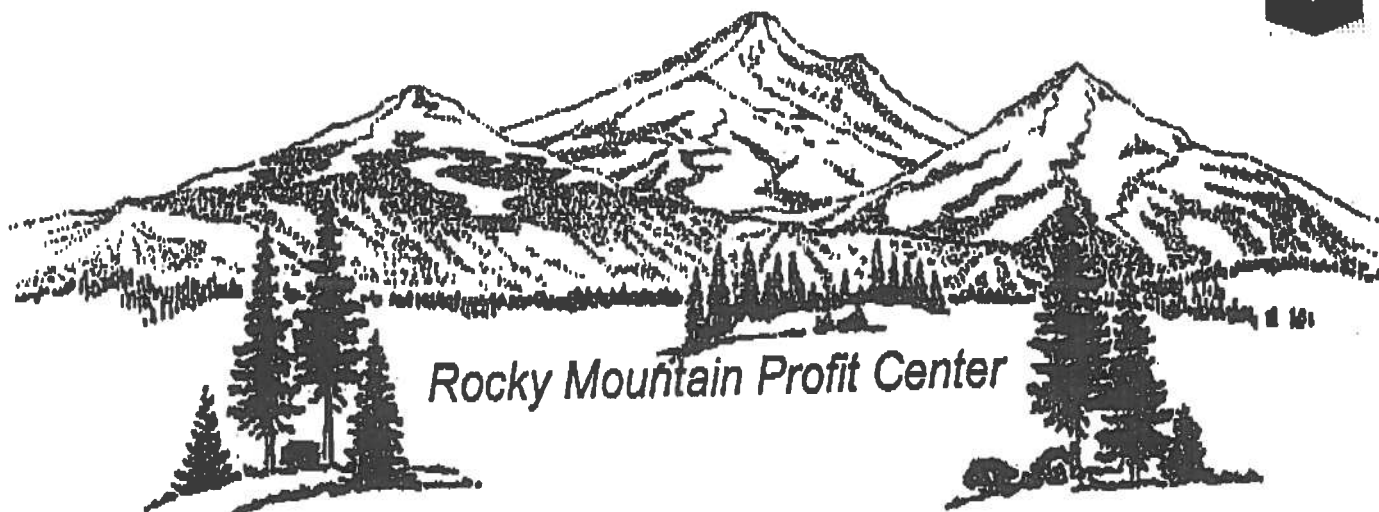
Sincerely,

(Rich Griebing, 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



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:

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