

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, July 13, 2015 2:15 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** FW: Piceance Energy LLC, Piceance 28-10 Pad, NESW Sec 28 T9S R93W, Mesa County, Form 2A#400826317 Review

**Categories:** Operator Correspondence

Scan No 2107617

OPERATOR CORRESPONDENCE

2A#400826317

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**From:** Wayne Bankert [mailto:[wbankert@Laramie-Energy.com](mailto:wbankert@Laramie-Energy.com)]  
**Sent:** Monday, July 13, 2015 1:25 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: Piceance Energy LLC, Piceance 28-10 Pad, NESW Sec 28 T9S R93W, Mesa County, Form 2A#400826317 Review

Dave,  
The COA's are acceptable to Piceance Energy.  
Thank you.

Wayne P. Bankert  
Snr. Reg. & Env. Coordinator  
Laramie Energy, II, LLC  
Piceance Energy, LLC (Laramie Energy Subsidiary)  
O: 970-812-5310  
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[wbankert@laramie-energy.com](mailto:wbankert@laramie-energy.com)

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, July 13, 2015 12:35 PM  
**To:** Wayne Bankert  
**Subject:** Piceance Energy LLC, Piceance 28-10 Pad, NESW Sec 28 T9S R93W, Mesa County, Form 2A#400826317 Review  
**Importance:** High

Wayne,

I have been reviewing the Piceance 28-10 Pad **Form 2A** (#400826317). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Piceance Energy LLC (Piceance) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

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

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, pipeline testing, start of hydraulic stimulation operations, and start of flowback operations (if different than the start of hydraulic stimulation operations) using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations). If this location is to be used as a completion support facility, notify the COGCC 48 hours prior to start of frac tank mobilization, water storage and completion support operations, temporary pipeline testing.

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

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at tank site during operations (as shown on the Location Drawing and the Construction Layout Drawings attachments); including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days and after significant precipitation events, and/or in accordance with CDPHE regulations), and maintained in good condition.

**COA 28** - The location is in an area of moderate to high run-on/run-off potential; therefore standard stormwater BMPs must be implemented at this location prior to construction, throughout construction, drilling, and completion operations to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater run-off.

**COA 44** - The access road will be constructed and 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.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

**Drilling/Completions:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. After drilling and completion operations have been completed, the drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must meet the applicable standards of Table 910-1. Land-farming of E&P waste is prohibited on the location; however, this shall not preclude onsite disposal of E&P waste in accordance with COGCC Rules and permit conditions. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location. No offsite disposal of cuttings to another oil and gas location shall occur without prior approval of an amended Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. Commercial disposal of drill cuttings will only require notification to COGCC via a Form 4 Sundry Notice.

**COA 25** - If the wells are to be hydraulically stimulated, 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.

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface or buried permanent pipelines (poly or steel) are used during operations at the well pad location or nearby well pads:

**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.

**COA 55** - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

COGCC would appreciate your concurrence with attaching the COGCC COAs to the Form 2A permit prior to passing the OGLA review. 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



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