

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, November 17, 2015 12:01 PM
To: dave.kubeczko@state.co.us
Subject: GRMR Oil & Gas LLC, Stover Federal 9-12 1D Pad, NWSW Sec 9 T4N R90W, Moffat County, Form 2A#400891937 Review

Categories: Operator Correspondence

Scan No 2107697 CORRESPONDENCE 2A#400891937

From: Terry Hoffman [mailto:terry@rockymountainpermitting.com]
Sent: Wednesday, November 11, 2015 11:12 AM
To: Dave Kubeczko - DNR
Subject: RE: GRMR Oil & Gas LLC, Stover Federal 9-12 1D Pad, NWSW Sec 9 T4N R90W, Moffat County, Form 2A#400891937 Review

Dave sorry for the delay in responding but I thought I had taken care of this. The COA's listed below are acceptable to GRMR and yes I will forward any wildlife strips from the BLM APD that I receive.

Thanks as always for your help.

Terry

ROCKY MOUNTAIN PERMITTING, LLC
Terry L. Hoffman
Owner

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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, November 03, 2015 12:58 PM
To: Terry Hoffman <terry@rockymountainpermitting.com>
Subject: GRMR Oil & Gas LLC, Stover Federal 9-12 1D Pad, NWSW Sec 9 T4N R90W, Moffat County, Form 2A#400891937 Review

Terry,

I have been reviewing the Stover Federal 9-12 1D Pad **Form 2A** (#400891937). COGCC will update the Access Road Map submitted on 11-03-15. COGCC would like to attach the following conditions of approval (COAs) based on the information and data GRMR Oil & Gas LLC (GRMR) has submitted on or attached to the Form 2A, as well as information gained during the onsite on October 15, 2015, prior to passing the Oil and Gas Location Assessment (OGLA) review.

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

COA 91 - In addition to the notifications required by COGCC listed in the Northwest Notification Policy and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing**

Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change); operator shall notify the COGCC 48 hours prior to rig mobilization, start of flowback operations (if applicable and/or if the start of flowback is delayed by more than 10 days), and pipeline testing (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

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

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations; 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 fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals as required by CDPHE (at least every 14 days and after precipitation events), and maintained in good condition. The design of any perimeter berm shall be sized, constructed, and compacted sufficiently to contain fluids during drilling operations, as well as all fluids contained in temporary frac tanks during completion operations.

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 encouraging established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

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

COA 31 - If the operator intends to obtain water from the nearby Williams Fork River, the pump and pipeline system must be capable of preventing any backflow into the river after pump shutdown. Any water pumped from the Williams Fork River, but not used during the drilling and completion operations, must be disposed of offsite, not back into the river.

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. 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 a 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 well(s) is (are) to be hydraulically stimulated, then 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:

COA 45 - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) 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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, could GRMR provide COGCC with the COAs and any wildlife stipulations that BLM attaches to

this location when you receive the approved Federal APD(s). 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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