

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, June 15, 2016 7:40 AM
To: Dave Kubeczko
Subject: SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Categories: Operator Correspondence

Scan No. 2107856 OPERATOR CORRESPONDENCE 2A#401033255

From: Spence Laird [mailto:slaird@sandridgeenergy.com]
Sent: Wednesday, June 15, 2016 7:38 AM
To: Dave Kubeczko - DNR
Subject: RE: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Thank you for these updates. Sandridge is good with these. Thank you for moving these onto Barbara to get this approved!

Thank you for all your help!

Spence Laird



From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Wednesday, June 15, 2016 8:11 AM
To: Spence Laird
Subject: FW: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review
Importance: High

Spence, I have revised COAs 58, 91, and 66 as shown below:

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

COA 91- In addition to the notifications required by COGCC listed in the **Northwest Notification Policy (Notice of Intent to construct a new location)** and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to pipeline testing (flowlines from **the separators on the two nearby well pads to the storage tanks on this central tank battery location** and/or any lines associated with truck loading 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.

COA 66 - Operator will construct a loading/unloading station located near the tank battery, to deliver fluids to or remove fluids from the oil and produced water storage tanks by truck.?? The loading/unloading station shall be designed and utilized to prevent hoses from being dropped and dragged over the ground, which could lead to releases outside of containment.?? The loading/unloading station will be the only permitted access for manual fluids transfers to or from the storage tanks.?? Vehicles will not be allowed to approach the storage tanks any closer than the loading/unloading station.?? Each station will be constructed to be sufficiently impervious to contain any spilled or released material and have a catch basin in case a leak occurs while operations personnel are connecting or disconnecting hoses.???? Signs clearly marking the truck loading/unloading station shall be provided and maintained by the operator.

This COA applies to vehicles (oil and water trucks) used for pulling water or oil from the loadout station, not directly from the tanks, unless there is equipment problems at the loadout station, in which case, water and oil trucks could then pull directly from the individual tanks. directly from the tanks then this should only impact. Also, if operator needs to remove/repair/replace a tank, then such equipment necessary to perform the work (water truck, vacuum truck, crane truck) would be allowed as close to the tank battery area and individual tanks as necessary.

Let me know if these revisipons are acceptable and address the issues raised by SandRidge. 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
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Cell: (970) 309-2514
dave.kubeczko@state.co.us | www.colorado.gov/cogcc

 *Please consider the environment before printing this e-mail*

From: Spence Laird [mailto:slaird@sandridgeenergy.com]
Sent: Tuesday, June 14, 2016 5:09 PM
To: Dave Kubeczko
Subject: Re: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

We do use corrugated steel so never mind. Thank you.

Spence Laird
Sandridge Energy

405-420-8415

On Jun 14, 2016, at 5:48 PM, Spence Laird <slaird@sandridgeenergy.com> wrote:

Last question. See below.

Spence Laird
Sandridge Energy
405-420-8415

Begin forwarded message:

From: Jason Niven <jniven@sandridgeenergy.com>
Date: June 14, 2016 at 5:44:01 PM CDT
To: Angela Ibara <aibara@sandridgeenergy.com>, Spence Laird <slaird@sandridgeenergy.com>, Nathan Harbin <nharbin@sandridgeenergy.com>
Subject: RE: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Also, I am not sure our tank containment specifically matches the requirements of **COA 58**. We will have lined containment with a steel wall but from my understanding it is not the corrugated steel wall. We meet the intent but likely not the exact terminology.

Jason Niven

From: Spence Laird
Sent: Monday, June 13, 2016 9:40 AM
To: Angela Ibara <aibara@sandridgeenergy.com>
Subject: FW: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Please read the below and give me your thoughts on if we want to keep some of these COA's or discuss other options with him.

Thanks

Spence Laird

From: Spence Laird [mailto:slaird@sandridgeenergy.com]
Sent: Tuesday, June 14, 2016 4:36 PM
To: Dave Kubeczko
Subject: Fwd: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

So sorry, just got this below...hope this doesn't delay the approval.

Spence Laird
Sandridge Energy

405-420-8415

Begin forwarded message:

From: Jason Niven <jniven@sandridgeenergy.com>

Date: June 14, 2016 at 5:22:21 PM CDT

To: Angela Ibara <aibara@sandridgeenergy.com>, Spence Laird <slaird@sandridgeenergy.com>, Nathan Harbin <nharbin@sandridgeenergy.com>

Subject: RE: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

I have questions/concerns regarding the following COAs.

COA 91 – Which lines are covered under this COA. Is it online the lines onsite at the Bighorn or does it also include any pipeline associated with the Bighorn? Does it include the flowline between the well head and separators back at the producing site that is connected into the pipelines connected to the Bighorn?

COA 66 – I am not okay with the ban of all vehicles not being able to get closer to the tanks than the distance to the loading rack. Pumpers or maintenance trucks would get closer to the tanks. If the intent is to prevent pulling water or oil directly from the tanks then this should only impact oil and water trucks. Also, if we had to remove/repair/replace a tank we would likely need to get a water/vac truck close to the tanks and suck out the very bottom of the tank that cannot be pulled out through the load lines. We need some room to manually pull from the tanks under abnormal or emergency conditions.

Everything else looks fine. I am glad we already plan for lined containment.

Jason Niven

From: Angela Ibara

Sent: Tuesday, June 14, 2016 3:35 PM

To: Spence Laird <slaird@sandridgeenergy.com>; Nathan Harbin <nharbin@sandridgeenergy.com>; Jason Niven <jniven@sandridgeenergy.com>

Subject: RE: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Looking at this one, I would run it by Nate and Jason. Thanks.

Angela

From: Spence Laird

Sent: Monday, June 13, 2016 9:40 AM

To: Angela Ibara <aibara@sandridgeenergy.com>

Subject: FW: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Please read the below and give me your thoughts on if we want to keep some of these COA's or discuss other options with him.

Thanks

Spence Laird

From: Dave Kubezko - DNR [mailto:dave.kubezko@state.co.us]
Sent: Tuesday, June 14, 2016 11:21 AM
To: Dave Kubezko
Subject: FW: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

From: Spence Laird [mailto:slaird@sandridgeenergy.com]
Sent: Tuesday, June 14, 2016 10:53 AM
To: Dave Kubezko - DNR
Subject: Re: <EXTERNAL> SandRidge Exploration & Production LLC, Bighorn 0780 17 Pad, NENW Sec 17 T7N R80W, Jackson County, Form 2A#401033255 Review

Sandridge has read and agrees to the venting and flaring rules and policy. SandRidge is good with these COA's. Please feel free to move forward with approval of the 2A sir. Thank you for all your help and communication throughout this matter!

Spence Laird
Sandridge Energy
405-420-8415

On Jun 10, 2016, at 1:08 PM, Dave Kubezko - DNR <dave.kubezko@state.co.us> wrote:

This email originates from an external source. Please be cautious before clicking on any links and/or opening any attachments.

Laci and Spence,
??

I have been reviewing the SandRidge Exploration & Production LLC (SandRidge), Bighorn 0780 17 Pad **Form 2A??#401033255**. ??COGCC would like to attach to the Form 2A the following COAs based on the information and data SandRidge??has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. ??

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Planning:?? The following condition of approval (COA) will apply:

COA 91??-??In addition to the notifications required by COGCC listed in the **Northwest Notification Policy (Notice of Intent to construct a new location)** and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to pipeline testing (flowlines from wellheads to separators to tanks; and/or any lines associated with truck loading 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.

Corrected distances from Production Facility to Building Unit from 1586' to 2130' and from Production Facility to Public Road from 1247?? to 1723?? and from Production Facility to Above Ground Utility Line from 1?? to 60?? based on COGCC's review of the Location Drawing, Facility Layout Drawing, COGCC's Online GIS Map, and per operator on 06-10-16.

Corrected estimated post-construction ground elevation from 8122?? to 8148?? based on COGCC??s review of the Construction Layout Drawings, the Facility Layout Drawing, and per operator on 06-10-16.

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

COA 23??-??Operator must ensure secondary containment for any volume of fluids contained at the tank battery site during truck tank loading and production 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

b. Except for gas flared or vented during an upset condition, well maintenance, well stimulation flowback, purging operations, or a productivity test, gas from a well shall be flared or vented only after notice has been given and approval obtained from the Director on a Sundry Notice, Form 4, stating the estimated volume and content of the gas. The notice shall indicate whether the gas contains more than one (1) ppm of hydrogen sulfide. If necessary to protect the public health, safety or welfare, the Director may require the flaring of gas.

c. Gas flared, vented or used on the lease shall be estimated based on a gas-oil ratio test or other equivalent test approved by the Director, and reported on Operator's Monthly Report of Operations, Form 7.

d. Flared gas that is subject to Sundry Notice, Form 4, shall be directed to a controlled flare in accordance with Rule 903.b.(2) or other combustion device operated as efficiently as possible to provide maximum reduction of air contaminants where practicable and without endangering the safety of the well site personnel and the public.

e. Operators shall notify the local emergency dispatch or the local governmental designee of any natural gas flaring. Notice shall be given prior to flaring when flaring can be reasonably anticipated, or as soon as possible, but in no event more than two (2) hours after the flaring occurs.

??

Please respond to this email indicating that you have read the policy and rules concerning venting and flaring and will adhere to both.?? COGCC would also appreciate your concurrence with attaching the COAs to the Form 2A 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.

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Dave

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David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist
Western Colorado

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<image001.jpg>

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Colorado Oil & Gas Conservation Commission
Northwest Area Office
796 Megan Avenue, Suite 201
Rifle, CO 81650
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Cell: (970) 309-2514

dave.kubeczko@state.co.us?? |?? www.colorado.gov/cogcc

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<COGCC NOTICE TO OPERATORS - Rule 912 Flaring and Venting Statewide_dated 01122016.pdf>