

## Dave Kubeczko - DNR

---

**From:** Dave Kubeczko - DNR  
**Sent:** Thursday, October 13, 2016 11:08 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** Resend of: QEP Energy Company, Powder Wash 19-1 Pad, SESE Sec 19 T12N R97W, Moffat County, Form 2A#400985285 Review

**Categories:** Operator Correspondence

Scan No. 2107991      CORRESPONDENCE      2A#400985285

---

**From:** Melissa Cunningham [mailto:[Melissa.Cunningham@qepres.com](mailto:Melissa.Cunningham@qepres.com)]  
**Sent:** Thursday, October 13, 2016 8:43 AM  
**To:** Dave Kubeczko - DNR  
**Cc:** Julie Jacobson  
**Subject:** RE: Resend of: QEP Energy Company, Powder Wash 19-1 Pad, SESE Sec 19 T12N R97W, Moffat County, Form 2A#400985285 Review

Dave,

These COAs all look to be in order and QEP concurs with the COAs.

Thanks,

*Melissa*

**MELISSA CUNNINGHAM**  
Senior Permit Agent, Regulatory Affairs  
P 307.367.4012 \ M 720.201.5944  
9663 US Hwy 191 \ PO Box 2125  
Pinedale \ WY \ 82941  
[www.qepres.com](http://www.qepres.com)



---

**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, October 12, 2016 7:24 AM  
**To:** Melissa Cunningham  
**Subject:** Resend of: QEP Energy Company, Powder Wash 19-1 Pad, SESE Sec 19 T12N R97W, Moffat County, Form 2A#400985285 Review

Melissa,

Has QEP reviewed these COAs and can you reply with concurrence of them. 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  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)



---

**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Friday, September 23, 2016 6:38 AM  
**To:** Melissa Cunningham  
**Subject:** QEP Energy Company, Powder Wash 19-1 Pad, SESE Sec 19 T12N R97W, Moffat County, Form 2A#400985285 Review

Melissa,

I have been reviewing the QEP Energy Company (QEP), Powder Wash 19-1 Pad **Form 2A# 400985285**. COGCC would like to attach to the Form 2A the following COAs based on the information and data GRMR 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** - In addition to the notifications required by COGCC listed in the **Northwest Notification Policy (Notice of Intent to construct a new location, Notice of Intent to install a pit liner, Notice of Intent to spud surface casing, and Notice of Intent to commence hydraulic fracturing operations)** 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 pipeline testing (flowlines from wellheads to separators to tanks) 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.

**COGCC corrected Drilling Mud Disposal to "OFFSITE" and "Recycle/Reuse" per operator discussion on 08-31-16.**  
**COGCC corrected distances from Wellhead to Public Road (BLM 62H) from 5280' to 1786'; from Production Facility to Public Road (BLM 62H) from 5280' to 1847'; based on COGCC's review of the complete Surveyor's Package.**

**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 (as shown on the Construction Layout Drawing, Location Drawing, and Proposed Stormwater BMPs 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 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/build 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 76** - Strategically apply fugitive dust control measures, including encouraging established speed limits on access roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

**Drilling/Completions:** The following condition of approval (COA) will apply:

**COA 11** - The moisture content of water/bentonite-based mud (WBM) generated cuttings or foam/mist generated cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. The operator has indicated that 'Cuttings Disposal' will be "ONSITE" and that the 'Cuttings Disposal Method' will be "CUTTINGS TRENCH" (as shown in the 'DRILLING WASTE MANAGEMENT PROGRAM SECTION' of the Form 2A. After drilling and completion operations have been completed, any of the WBM 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. Representative cuttings samples (determined by the operator) for material left on location will be analyzed for all Table 910-1 constituents. Any material which does not meet Table 910-1 criteria will either be manifested and disposed offsite at an approved commercial facility, or amended further onsite to comply with Table 910-1. All liners associated with drilling mud or drill cuttings must be disposed of offsite per CDPHE rules and regulations. No liner can be disposed of in place.

**COA 12** - A closed loop system must be implemented during drilling (as indicated on the Form 2A).

**COA 25** - Based on information from the operator, fracing of this directional gas well is not planned. However, if during the completion process, the operator decides that portions of the production zone will require fracing and stimulation; all flowback and stimulation fluids must be sent to enclosed tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline storage vessel, or other open top containment located on the well pad; or into tanker trucks for offsite disposal. No open top tanks can be used for initial flowback fluids containment. 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. No additional downgradient berming is required if operator constructs a sufficiently sized perimeter berm.

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

**Material Handling and Spill Prevention:** The following condition of approval (COA) will apply:

**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, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance.

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. COGCC can approve this form with a timely response from GRMR. 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  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)



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