

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, August 11, 2010 6:56 PM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, Cascade Creek 608-43-31, NESE Sec 8 T6S R97W, Garfield County, Form 2A #400077440 Review

Scan No 2033296 CORRESPONDENCE 2A#400077440

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Tuesday, August 03, 2010 8:54 AM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 608-43-31, NESE Sec 8 T6S R97W, Garfield County, Form 2A #400077440 Review

Dave:

In response to item #1 below, the total disturbed area including the previously disturbed area and access road, appears to be approximately 6/0+ acres in size.

Regards,

Joan

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Friday, July 30, 2010 2:29 PM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 608-43-31, NESE Sec 8 T6S R97W, Garfield County, Form 2A #400077440 Review

Dave:

In response to your email:

The sundry submitted 6/18/2010 requested that the location number 383337 be canceled; your email indicates the opposite. Would you please confirm that the correct location number is 324296?

1. Construction: I am researching this question and hope to have an answer to you by Monday.
2. OXY agrees with the COAs listed.
3. OXY agrees with the COAs listed for the NTO Drilling Wells on the Roan Plateau.

In future submissions, I will separate the attachments. (I had attended a training class in Denver and Marc Fine said that we could always condense the attachments for submission since they were able to separate them out upon receipt.)

Thank you.

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]

Sent: Friday, July 30, 2010 11:07 AM

To: Proulx, Joan M

Subject: Oxy USA WTP, Cascade Creek 608-43-31, NESE Sec 8 T6S R97W, Garfield County, Form 2A #400077440 Review

Joan,

I have been reviewing the Cascade Creek 608-43-31 **Form 2A** (#400077440). I appreciate you sending me the cross-sections for the construction layout drawings (I have attached them to the permit). I have also changed the location number from 324296 to 383337. COGCC requests the following clarifications regarding the data Oxy USA has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Construction (Section 6):** The size of the disturbed area during construction (3.50 acres) appears to be low based on the construction layout drawings. COGCC's review indicates that the total disturbed area, including the previously disturbed pad and access road, may be as large as approximately 6.61 acres. I can make the change if you send an email with this request, or if you think the total disturbed area is different, please confirm what the size should be.
2. **General:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County; therefore, this location will be designated a **sensitive area**. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit (or any other pit used to contain/hold fluids) must be lined or a closed loop system must be implemented during drilling.
 - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.
3. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Operator must comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:
 - COA 6** - All pits must be lined.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. Also, in the future, to help expedite COGCC's review process, we would appreciate the separation of various attachments (e.g., Hydrology Map, Construction Layout Drawings, Location Drawing, Access Road Map, Multi-Well Plan, Reference Area Map) as opposed to them being embedded within one attachment (in this case, the "Construction Layout Drawings" attachment). This would be very helpful throughout all stages of the permit review process, as several groups review various portions (and attachments) of the permit. 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

Colorado Oil & Gas Conservation Commission

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