

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 07, 2010 12:01 PM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, Cascade Creek 608-41, NENE Sec 8 T6S R97W, Garfield County, Form 2A #400085948 Review

Scan No 2033342 CORRESPONDENCE 2A#400085948

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Tuesday, August 31, 2010 11:34 AM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 608-41, NENE Sec 8 T6S R97W, Garfield County, Form 2A #400085948 Review

Dave:

In response to the items below:

1. It is Oxy practice to have at least 110% secondary containment of the largest single tank (as per COGCC rules) at a well site during drilling and completion operations.
2. Oxy concurs with Item #2; it is Oxy's policy to line all pits on our Mesa operations.
3. Given that the 608-41 pad location is not located within the NTO, and the Oxy policy is to line pits on our Mesa operations, Oxy requests that this item be removed.

If you have any questions, please contact me at 970.263.3694.

Thank you.

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, August 30, 2010 11:18 AM
To: Proulx, Joan M
Subject: Oxy USA WTP, Cascade Creek 608-41, NENE Sec 8 T6S R97W, Garfield County, Form 2A #400085948 Review

Joan,

I have been reviewing the Cascade Creek 608-41 Pad **Form 2A** (#400085948). 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.

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 398 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC guidelines require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) a **sensitive area** and requiring the following conditions of approval (COAs):
COA 4 - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

2. **General:** COGCC's review indicates that the well pad location is approximately 361 feet from the current northern edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Although this well pad location does not fall within the current Roan Rim NTO boundaries, those boundaries are currently being revised, that coupled with 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 must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.

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; 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 sufficiently protective of nearby surface water. 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.

Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County: Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within $\frac{3}{4}$ 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 (items 1, 2, and 3) to the Form 2A permit prior to passing the OGLA review. The other issue (item 1) also needs to be addressed prior to permit approval. 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
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