

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 14, 2010 10:37 AM
To: Kubeczko, Dave
Subject: FW: Piceance Creek Unit 197-12A1, NWSE Sec 12 T1S R97W, Rio Blanco County, Form 2A #400086733 Review
Attachments: pic01416.gif

Scan No 2033368 CORRESPONDENCE 2A#400086733

-----Original Message-----

From: roy.l.springfield@exxonmobil.com [mailto:roy.l.springfield@exxonmobil.com]
Sent: Monday, August 30, 2010 12:10 PM
To: Kubeczko, Dave
Subject: Re: Piceance Creek Unit 197-12A1, NWSE Sec 12 T1S R97W, Rio Blanco County, Form 2A #400086733 Review

Dave:

I agree with the COA's listed below.
With regards to item 2, I also agree that it should be 922 feet.

Thanks,

Roy L. Springfield
Regulatory Specialist
Exxon Mobil Corporation
USP Permitting Group - Wyoming, Colorado & New Mexico

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"Federal and State regulations require accurate submittal of all permits prior to commencement of work and timely follow - up reports. Failure to comply with the regulations places ExxonMobil in jeopardy of receiving civil and criminal penalties. Notices of Violation (NOV's), Incidents of Non - Compliance (INC's), production shut - in, loss of credibility, and/or negative publicity. USP - Permits appreciates your assistance in providing the requested data."

"Kubeczko,
Dave"

<Dave.Kubeczko
@state.co.us>

To
<roy.l.springfield@exxonmobil.com>
cc

08/30/2010

01:03 PM

Subject

Piceance Creek Unit 197-12A1, NWSE
Sec 12 T1S R97W, Rio Blanco County,
Form 2A #400086733 Review

Roy,

I have been reviewing the North Piceance Creek Unit 197-12A1 Form 2A (#400086733). COGCC will attach the following conditions of approval (COAs) based on the data ExxonMobil has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. Construction (Section 6): The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used? has been marked Yes; therefore the following conditions of approval (COAs) will apply:

COA 11 - Either a lined drilling pit or closed loop system must be implemented.

COA 12 - Production pits must be lined.

2. Water Resources (Section 14): Form 2A indicates the distance to the nearest surface water is 3588 feet. COGCC's review indicates there are several intermittent drainages/streams and ponds in the area, with the closest stream being 922 feet to the southwest. I can make the change if you send an email with this request.

3. General: Due to the highly fractured nature of the surface material in this area, as well as the extremely steep grade locate just off the pad edges; the following conditions of approval (COAs) will apply:

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.

COA 46 - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and/or stormwater runoff.

COGCC would appreciate your concurrence with attaching these COAS (items 1 and 3) to the Form 2A permit prior to passing the OGLA review. The other issue (item 2) also needs to be address 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
Oil and Gas Location Assessment Specialist

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