

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, September 15, 2010 4:19 PM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, My Way Ranch 8-4 Pad, NWNW Sec 8 T10S R94W, Mesa County, Form 2A #400087553 Review
Attachments: img-909125943-0001.pdf

Scan No 2033393 CORRESPONDENCE 2A#400087553

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Thursday, September 09, 2010 1:13 PM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, My Way Ranch 8-4 Pad, NWNW Sec 8 T10S R94W, Mesa County, Form 2A #400087553 Review

Dave:

In response to the items listed below:

1. My apologies, I neglected to include the reference area photos; they are attached.
2. Oxy concurs with COA 9, COA 23, COA 38 and COA 39. For COA 46, the location pictures reference that the area surrounding this existing pad has been re-vegetated and Oxy has a Stormwater Management Plan in existence to manage stormwater runoff/run-on.

Thank you, and please let me know if you have further questions.

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, September 09, 2010 11:37 AM
To: Proulx, Joan M
Subject: Oxy USA WTP, My Way Ranch 8-4 Pad, NWNW Sec 8 T10S R94W, Mesa County, Form 2A #400087553 Review

Joan,

I have been reviewing the My Way Ranch 8-4 Pad **Form 2A** (#400087553). COGCC requests the following clarifications regarding the data Oxy USA has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (09/01/2010). I have added the following statement to the **Comments (Section 15.)** of the Form 2A: *"Reference area pictures taken during the growing season will be provided within 12 months of the date of this permit application (9-1-10)."*
2. **General:** Due to the potentially highly fractured nature of the surface material in this area, the following conditions of approval (COAs) will apply:
COA 9 - Reserve pit (or any other pit used to store fluids) must be lined or closed loop system must be implemented during drilling.

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 (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

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 (item 2) to the Form 2A permit 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.

Dave

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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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