

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, October 04, 2010 4:14 PM
To: Kubeczko, Dave
Subject: FW: Expanded Liberty Unit 396-6A1, SENE Sec 6 T3S R96W, Rio Blanco County, Form 2A # 400091785 Review
Attachments: pic02750.gif

Scan No 2033432 CORRESPONDENCE 2A#400091785

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

From: roy.l.springfield@exxonmobil.com [mailto:roy.l.springfield@exxonmobil.com]
Sent: Monday, September 20, 2010 12:55 PM
To: Kubeczko, Dave
Subject: Re: Expanded Liberty Unit 396-6A1, SENE Sec 6 T3S R96W, Rio Blanco County, Form 2A #400091785 Review

Dave:

I concur with the COA's as listed below.

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.1.springfield@exxonmobil.com>
cc

09/20/2010

12:52 PM

Subject

Expanded Liberty Unit 396-6A1, SENE
Sec 6 T3S R96W, Rio Blanco County,
Form 2A #400091785 Review

Roy,

I have been reviewing the Expanded Liberty Unit 396-6A1 Form 2A (#400091785). COGCC would like to attach the following conditions of approval (COAs) based on the information and 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 12a - Production pits and cuttings pits must be lined.

2. 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 44 - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COGCC would appreciate your concurrence with attaching these COAS 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

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