

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, October 04, 2010 4:19 PM
To: Kubeczko, Dave
Subject: FW: Wexpro, Powder Wash 20-2 Pad, SWSW Sec 20 T12N R97W, Moffat County, Form 2A (#400065632) Review

Scan No 2033436 CORRESPONDENCE 2A#400065632

From: Dee Findlay [mailto:Dee.Findlay@questar.com]
Sent: Monday, September 27, 2010 8:49 AM
To: Kubeczko, Dave
Subject: RE: Wexpro, Powder Wash 20-2 Pad, SWSW Sec 20 T12N R97W, Moffat County, Form 2A (#400065632) Review

Dave:
Wexpro Company will comply with the COAs as listed below.

Dee Findlay
Wexpro Company
Permit Agent
307 922-5608
307 354-6346 (cell)
dee.findlay@questar.com

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, September 20, 2010 4:37 PM
To: Dee Findlay
Subject: Wexpro, Powder Wash 20-2 Pad, SWSW Sec 20 T12N R97W, Moffat County, Form 2A (#400065632) Review

Dee,

I have been reviewing the Powder Wash 20-2 Pad **Form 2A** (#400065632). COGCC requests the following clarifications regarding the data Wexpro 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. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 200 feet. COGCC guidelines require designating all locations with close proximity to surface water a **sensitive area** (which Wexpro has already indicated on the Form 2A) 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; 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 5** - Operator must implement best management practices to contain any unintentional release of fluids.
2. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference area has been indicated on a topographic map; 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 (09/10/2010).

3. **General:** The following conditions of approval (COAs) will apply:

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.

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 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
Oil and Gas Location Assessment Specialist

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