

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, October 19, 2010 10:02 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: ExxonMobil Corporation, Piceance Creek Unit 297-2C1-10 Pad, SESE Sec 2 T2S R97W, Rio Blanco County, Form 2A #400096230 Review  
**Attachments:** pic18221.gif

Scan No 2033464      CORRESPONDENCE      2A#400096230

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

From: lynn.r.neely@exxonmobil.com [mailto:lynn.r.neely@exxonmobil.com]  
Sent: Monday, October 04, 2010 2:13 PM  
To: Kubeczko, Dave  
Subject: Re: ExxonMobil Corporation, Piceance Creek Unit 297-2C1-10 Pad, SESE Sec 2 T2S R97W, Rio Blanco County, Form 2A #400096230 Review

Dave,  
We currently are complying with CDPHE & COGCC rules for stormwater requirements. Will this cover COA's 44 & 46 that you listed below?  
Please let me know.

Lynn Neely  
Regulatory Specialist - Permitting Group ExxonMobil Production Company - U.S. Production P.O.  
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email: lynn.r.neely@exxonmobil.com  
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"Kubeczko,  
Dave"  
<Dave.Kubeczko  
@state.co.us>

<lynn.r.neely@exxonmobil.com>      To  
cc

10/04/10 02:02  
PM

Subject  
ExxonMobil Corporation, Piceance  
Creek Unit 297-2C1-10 Pad, SESE Sec  
2 T2S R97W, Rio Blanco County, Form  
2A #400096230 Review

Lynn,

I have been reviewing the Piceance Creek Unit 297-2C1-10 Pad Form 2A (#400096230). 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.

1. Water Resources (Section 14): Form 2A indicates the distance to the nearest surface water is 469 feet. COGCC guidelines require designating all locations within close proximity to surface water a sensitive area; therefore, the following conditions of approval (COAs) will apply:

COA 4 - Location is in a sensitive area because of 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 (i.e., BMPs associated with stormwater management) sufficiently protective of the 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. 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 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.

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 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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