

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, December 29, 2010 7:58 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Axia Energy, Compressor and Water Handling Facility, SWSE Sec 23 T9S R95W, Mesa County, Form 2A (#400111757) Review  
**Attachments:** Scan No 2033537\_Axia Energy, Compressor and Water Handling Facility\_Form 15 Pit Permit COAs\_2A#400111757\_12142010.docx

Scan No 2033549      CORRESPONDENCE      2A#400111757

### RECEIVED VERBAL CONCURRENCE OF COAs FROM LORNE PRESCOTT, OLSSON ASSOCIATES ON DECEMBER 22, 2010

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, December 14, 2010 10:39 AM  
**To:** jstoddart@oaconsulting.com  
**Subject:** Axia Energy, Compressor and Water Handling Facility, SWSE Sec 23 T9S R95W, Mesa County, Form 2A (#400111757) Review

Jeff,

I have been reviewing the Compressor and Water Handling Facility **Form 2A** (#400111757). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Axia Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 80 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**. The following conditions of approval (COAs) will apply:
  - COA 4** - Location is in a sensitive area because of its proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at the water handling facility site during natural gas development activities and 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., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
2. **General:** The following conditions of approval (COAs) will apply:
  - COA 90** - Notify COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us); phone 970-309-2514) 48 hours prior to start of construction.
  - 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 47** - The completion/flowback fluids multi-well pit must be double-lined. The pit will also require a leak detection system (Rule 904.e).
  - COA 48** - Operator must submit a professional engineer (PE) approved/stamped as-built drawing (plan view and cross-sections) of the completion/flowback pit within 14 calendar days of construction.
  - COA 49** - The completion/flowback fluids multi-well pit must be fenced. If the completion/flowback pit is not closed (either drained and/or backfilled) immediately after natural gas development activities, then operator

must appropriately net the completion/flowback pit, in a timely manner, and maintain the fencing and netting until the pit is closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels.

**COA 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the facility pad. The flowback and stimulation fluid tanks must be placed on the pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

**COA 41** - All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure 150 percent secondary containment for the largest structure containing fluids within each bermed area the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

**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. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

**COA 91** - At the time of pit closure, operator must submit disposal information via a Form 4 Sundry Notice to Dave Kubeczko. The disposal method will need to be approved prior to operator starting pit closure. In addition, operator will collect a pit water sample and, at a minimum, analyze for the following parameters: pH; alkalinity; specific conductance; major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); BTEX/DRO; TPH; PAH's (including benzo[a]pyrene); and metals (arsenic, barium, calcium, chromium, iron, magnesium, selenium). At the time of closure/disposal of pit water, COGCC may require additional analytes, as appropriate.

**COA 96** - Operator shall implement reasonable noise reduction equipment on compressors and other production equipment or add sound barriers to limit noise levels at property boundaries.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. COAs 4, 5, 90, 39, 47, 48, 49, 25, and 91 will also be attached to the Form 15 Pit Permit (see attachment). 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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