

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, January 05, 2011 8:01 AM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, Cascade Creek 697-17B Pad, SWNE Sec 17 T6S R97W, Garfield County, Form 2A (#400118447) Review

Scan No 2033569 CORRESPONDENCE 2A#400118447

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Tuesday, January 04, 2011 1:13 PM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 697-17B Pad, SWNE Sec 17 T6S R97W, Garfield County, Form 2A (#400118447) Review

Dave:

Oxy concurs with attaching the COAs listed below, with one exception, to the Form 2A for the 697-17B pad.

COA 58 references Rule 603.e.(12), which indicates that "Berms or other secondary containment devices in high density areas....." Because the 697-17B pad is not located in a high density area, Oxy does not concur with attaching this COA to the Form 2A.

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

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Saturday, January 01, 2011 12:35 PM
To: Proulx, Joan M
Subject: Oxy USA WTP, Cascade Creek 697-17B Pad, SWNE Sec 17 T6S R97W, Garfield County, Form 2A (#400118447) Review

Joan,

I have been reviewing the Cascade Creek 697-17B Pad **Form 2A** (#400118447). 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. **General:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County; therefore, this location will be designated a **sensitive area**. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
 - COA 9** - Any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) must be lined.
 - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.

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., 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 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 well pad. The flowback and stimulation fluid tanks must be placed on the well 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)). Under .e.(12)een upset conditions during flowback operations, operator may discharge flowback fluids directly into the pit, as needed (notice of intent to directly discharge into the pit must be sent to Dave Kubeczko; email dave.kubeczko@state.co.us).

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.

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.

2. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¼ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

COA 6 - All pits must be lined.

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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