

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 19, 2011 10:47 AM
To: Kubeczko, Dave
Subject: FW: Wexpro, Powder Wash Government 4 Pad, NENE Sec 8 T11N R97W, Moffat County, Form 2A (#400136734) Review

Categories: Orange Category

Scan No 2033710 CORRESPONDENCE 2A#400136734

From: Dee Findlay [mailto:Dee.Findlay@questar.com]
Sent: Monday, April 18, 2011 7:27 AM
To: Kubeczko, Dave
Cc: Tammy Fredrickson; Chris Beilby
Subject: RE: Wexpro, Powder Wash Government 4 Pad, NENE Sec 8 T11N R97W, Moffat County, Form 2A (#400136734) Review

Dave,
Wexpro is in agreement with the COAs listed below.

Dee Findlay

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Cell: (307) 354-6346 | Dee.Findlay@Questar.com

QUESTAR

*** I will be out of the office the 1st and 3rd Friday of each month***

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, April 14, 2011 5:09 PM
To: Dee Findlay
Subject: Wexpro, Powder Wash Government 4 Pad, NENE Sec 8 T11N R97W, Moffat County, Form 2A (#400136734) Review

Dee,

I have been reviewing the Powder Wash Government 4 Pad **Form 2A** (#400136734). COGCC would like to attach the following conditions of approval (COAs) based on the data and information WexPro has submitted 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 255 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 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., 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.

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

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

COA 6 - Reserve pit, if constructed (or any other pit constructed to hold fluids) must be lined or a closed loop system (which has been indicated by operator on the Form 2A) must be implemented during drilling. Construction Layout Drawings show a reserve pit. If this is actually the cuttings pit, then it does not need to be lined.

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)).

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 46 - The surface soils and materials are fine-grained and highly unconsolidated; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after well pad construction completion, as well as during all drilling and well completion operations. 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.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 2) to the Form 2A permit prior to passing the OGLA review. In addition, could WexPro provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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