

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, June 08, 2011 9:42 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Resend of: SWEPI LP, Harper Hill 1-29 & 2-29 Pad, SENW Sec 29 T4N R90W, Moffat County, Form 2A #1635536 Review

**Categories:** Orange - Operator Correspondence

**Scan No 2033858      CORRESPONDENCE      2A#1635536**

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 31, 2011 8:37 AM  
**To:** Michael.Bergstrom@shell.com  
**Subject:** Resend of: SWEPI LP, Harper Hill 1-29 & 2-29 Pad, SENW Sec 29 T4N R90W, Moffat County, Form 2A #1635536 Review

Michael,

These COAs are placed on Form 2As independent of what is submitted on other Forms (15s, 4s, 27s) as this Location Assessment presents data and information that requires independent review. The location assessment specialist is not always in receipt of all applications relevant to a specific location. Every one of these COAs have been proposed to and accepted by other operators in Western Colorado. These COAs also aid our inspectors during various phases of the operation since some of the other Forms mentioned are not required to be posted at these sites and at times may take longer to get posted to our website.

COA 1 indicates that the location is in a sensitive area and therefore, closed loop or lined pits are necessary, whereas COA 11 indicates chloride or TPH drilling mud will be used and therefore a lined pit is necessary. These two COAs will be consolidated into one.

Many times during well pad and access road construction, BMPs are not always kept current with onsite modifications. Stormwater plans typically need updating and BMPs need adjustments based on field conditions; COA 46 is written to ensure that operators remain compliant with applicable Rules. The COGCC does not necessarily have access to site-specific stormwater management plans since they are submitted to and reviewed by CDPHE.

COA 39 has been removed.

Regarding COA 25, in the past we have been told by operators' regulatory and permit staff that fracing will not occur, but field operations people sometimes make that call after drilling. Therefore COA 25 will be revised as follows: **COA 25** - Based on information from the operator, fracing of these horizontal wells is not planned. However, if during the completion process, the operator decides that portions of the production zone will require fracing and stimulation; all 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.

In certain areas, we feel that operators need to be made aware of COGCC's additional or high visibility concerns. This is true with reiteration of certain rules (COA 58) that the COGCC believes is particularly critical in locations (most spills and releases occur at tanks) and may have not been followed as diligently as we had hoped during other situations.

Form 4 Sundries are often submitted after a permit has been issued changing drilling and completion plans. These COAs allow for the fluctuations, deviations, and changes resulting from the dynamic drilling process. At this point, operators in Rio Blanco, Moffat, Jackson, and Routt Counties have accepted and abided by these COAs and COGCC feels they are appropriate to ensure the protection of public health, safety and welfare, including the environment and wildlife resources. Changes to the COAs are shown below (yellow highlighted text for additions, black highlighted text for deletions). 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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**From:** [Michael.Bergstrom@shell.com](mailto:Michael.Bergstrom@shell.com) [<mailto:Michael.Bergstrom@shell.com>]

**Sent:** Friday, May 20, 2011 4:12 PM

**To:** Kubeczko, Dave

**Cc:** [abrown@norwestcorp.com](mailto:abrown@norwestcorp.com)

**Subject:** RE: SWEPI LP, Harper Hill 1-29 & 2-29 Pad, SENW Sec 29 T4N R90W, Moffat County, Form 2A #1635536 Review

We are uncertain how to respond to your request for clarification of "data SWEPI LP has submitted or attached to the Form 2A". No specific questions were provided.

We have reviewed the proposed Conditions of Approval (COAs) for the subject well and have the following comments.

- COA 11 is not necessary. We have submitted the Form 2 and Form 15 for these wells indicating our plan to use a closed-loop system and/or lined pits.
- COA 1 is not necessary. We have submitted the Form 15 for these wells indicating our plan to use a lined pits.
- COA 39 is not necessary. We have submitted design drawings accompanying the Form 2A and Form 15 for these wells indicating our plan to construct lined pits entirely in native material.
- COA 25 is not necessary. We have submitted the Form 2 for these wells indicating our plan that no hydraulic fracturing would occur during completion of these wells, at this time.

- COA 46 is not necessary. We have submitted stormwater and erosion control best management practices (BMPs) accompanying the Form 2A indicating our plan to implement appropriate BMPs. Additionally, a stormwater management plan is being prepared and implemented in compliance with Colorado Department of Public Health and Environment (CDPHE) and COGCC requirements.
- COA 58 is not necessary. Since Rule 604.a.(4) is part of the COGCC Amended Rules, we expect that all operators should comply with the terms and conditions of this provision. We do not understand the need for a COA that is apparently redundant with the COGCC Amended Rules.

**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]

**Sent:** Wednesday, May 11, 2011 3:24 PM

**To:** Bergstrom, Michael L SEPCO-UAS/E/USON

**Subject:** SWEPI LP, Harper Hill 1-29 & 2-29 Pad, SENW Sec 29 T4N R90W, Moffat County, Form 2A #1635536 Review

Michael,

I have been reviewing the Harper Hill 1-29 & 2-29 Pad **Form 2A** (#1635536). COGCC requests the following clarifications regarding the data SWEPI LP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, COGCC would like to attach the following conditions of approval (COAs) to the Form 2A.

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** – The drilling pit must be lined, or a closed loop system must be implemented during drilling.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 20 feet bgs for a well located 5777 feet from the proposed well pad. COGCC guidelines require designating all locations with potentially shallow groundwater a **sensitive area** and requiring **COA 11** listed in item 1.
3. **General:** The following conditions of approval (COAs) will also apply:  
**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.  
**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, and maintained in good condition.  
**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 25** - Based on information from the operator, fracing of these horizontal wells is not planned. However, if during the completion process, the operator decides that portions of the production zone will require fracing and stimulation; all 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.  
**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.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 3) 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

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