

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, August 03, 2012 2:02 PM
To: Kubeczko, Dave
Subject: FW: WPX Energy Rocky Mountain LLC, Duggan RWF 14-29 Pad, Lot 5 Sec 29 T6S R94W, Garfield County, Form 2A (#400282140) Review

Categories: Orange - Operator Correspondence, Brown - 2A Review Email to Operator

Scan 2034470 CORRESPONDENCE 2A#400284140

From: Kubeczko, Dave
Sent: Friday, August 03, 2012 1:59 PM
To: 'howard.harris@WPXENERGY.com'
Subject: WPX Energy Rocky Mountain LLC, Duggan RWF 14-29 Pad, Lot 5 Sec 29 T6S R94W, Garfield County, Form 2A (#400282140) Review

Howard,

I have been reviewing the Duggan RWF 14-29 Pad **Form 2A** (#400284140). COGCC will attach the following conditions of approval (COAs) based on the information and data WPX 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 644 feet (corresponding to the Colorado River). All locations within ¼-mile of the Colorado River and/or with close proximity to surface water are designated a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 23** - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 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 or buried permanent pipelines. Additional containment shall be required where temporary pumps and other necessary equipment or chemicals are located.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 241 feet bgs for a well located 491 feet from the proposed well pad. All locations within 1/8-mile of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 7** - Location is in a sensitive area because of the proximity to a water well; therefore either a lined drilling pit or closed loop system (which WPX has indicated on the Form 2A) must be implemented.
 - COA 8** - Location is in a sensitive area because of the proximity to a water well; therefore production pits, or any pit constructed to hold fluids, must be lined.
3. **General:** The following conditions of approval (COAs) will apply:
 - COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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 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, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

COA 44 - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters.

COA 46 - The location is in an area of moderate to high runoff/run-on potential at the proposed pad area from steep areas to the north-northeast toward the Colorado River; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during and after well pad construction, 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. Slopes with potential for runoff should be stabilized immediately following pad construction.

Based on the information provided in the Form 2A by WPX, COGCC will attach these COAs to the Form 2A permit, WPX does not need to respond, unless WPX has questions or concerns with details in this email. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

David A. Kubeczko, PG
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