

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, August 31, 2012 9:42 AM
To: Kubeczko, Dave
Subject: FW: WPX Energy Rocky Mountain LLC, Smith Gulch Frac Pad, NWNE Sec 32 T7S R96W, Garfield County, Form 2A (#400313334) Review

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

Scan No 2034512 CORRESPONDENCE 2A#400313334

From: Kubeczko, Dave
Sent: Friday, August 31, 2012 9:40 AM
To: 'greg.j.davis@wpxenergy.com'
Subject: WPX Energy Rocky Mountain LLC, Smith Gulch Frac Pad, NWNE Sec 32 T7S R96W, Garfield County, Form 2A (#400313334) Review

Greg,

I have been reviewing the Smith Gulch Frac Pad **Form 2A** (#400313334). COGCC would like to attach the following conditions of approval (COAs) based on the 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 216 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 23** - 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 frac tank water transfer/storage site during 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 location will be stabilized, inspected at regular intervals (every 14 days at a minimum during the construction phase and at least every 30 days during operations period), 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 permanent buried pipelines.
 - COA 9** - Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.
 - COA 12** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any reconfiguration of the pipeline network. Operator shall maintain pipeline pressure testing records throughout operations of the water transfer facility. The records will be made available to COGCC upon request.
 - COA 59** - Operator has indicated that this facility may be in operation from 3 to 5 years. Should the operation of this facility continue more than three years, a Form 28 shall be submitted and approved prior to the expiration of this Form 2A.
2. **General:** Form 2A indicates that this location will be used as a location that will be utilized to store and recycle frac flowback fluids between frac jobs. Based on the fluids to be stored and transported through the pipelines, as well as the distance, topography, and features (streams [both perennial and intermittent], ditches, drainages) present along the route, the following conditions of approval (COAs) will apply:
 - COA 58** - The area of the frac pad where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.

COA 48 - Operator must implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located.

COA 49 - Operator must routinely inspect the entire length of the surface pipeline to ensure integrity.

COA 54 - Operator must ensure 110 percent secondary containment for any potential volume of fluids that may be released from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings.

COA 55 - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

Based on the information provided in the Form 2A by WPX Energy, 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.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



 *Please consider the environment before printing this e-mail*