

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, April 02, 2013 1:48 PM
To: dave.kubeczko@state.co.us
Subject: FW: D.J. Simmons Inc, Pinto 1-7 Pad, Lot 11 Sec 7 T39N R19W, Dolores County, Form 2A (#400371641) Review

Categories: Operator Correspondence

Scan No 2106551 CORRESPONDENCE 2A#400371641

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, April 02, 2013 11:55 AM
To: clopez@djsimmons.com
Subject: D.J. Simmons Inc, Pinto 1-7 Pad, Lot 11 Sec 7 T39N R19W, Dolores County, Form 2A (#400371641) Review

Chris,

I have been reviewing the Pinto 1-7 Pad **Form 2A** (#400371641). COGCC would like to attach the following conditions of approval (COAs) based on the information submitted by D.J. Simmons on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

General: The following conditions of approval (COAs) will apply:

COA 91 - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines

COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids (excluding freshwater) contained at well site during drilling and completion operations (as indicated on the BMP tab of the Form 2#400369343 and the Construction Layout Drawings attachment); 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 11 - Either a lined drilling pit or closed loop system must be implemented.

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 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 drill cuttings are to remain/disposed of onsite, they must also meet the applicable standards of table 910-1.

COA 25 - If the well is hydraulically stimulate, then flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

Based on the information provided in the Form 2A by D.J. Simmons, COGCC will attach these COAs to the Form 2A permit, D.J. Simmons does not need to respond, unless you have questions or concerns with details in this email. In addition, could D.J. Simmons provide COGCC with the COAs and wildlife stipulations (if any) that the 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
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Western Colorado

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