

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, January 30, 2014 2:02 PM
To: dave.kubeczko@state.co.us
Subject: FW: Stateline 22-2 Well
Attachments: Stateline 22-2 500' Radius Map.pdf

Scan No 2106855 CORRESPONDENCE 2A#400536061

From: Chris Lopez [mailto:clopez@djsimmons.com]
Sent: Thursday, January 30, 2014 1:54 PM
To: 'dave.kubeczko@state.co.us'
Subject: Stateline 22-2 Well

Thanks for the update Dave,

D. J. Simmons, Inc. concurs with the COA's in regards to Form 2A (Doc #400536061) your sent earlier today. I have attached a revised 500' Radius Map showing a 500' radius from the edge of the 50' Construction Buffer surrounding the proposed well pad. Please make the following amendments to the Facilities portion of Form 2A as well:

- 1) Please remove the (1) Temporary Large Volume Above Ground Storage Tank from our application. D. J. Simmons does not anticipate having this type of facility on location and it was simply a typo when the original form was submitted.
- 2) Pipelines on location will include a 'Combined Fluids' pipeline from the wellhead to the Separator, 2" Oil Dumps and 2" Water Dumps connecting the Separator and 400 bbl Oil/Water tanks inside of the berms, and both a 2" Gas line and 2" Water line leaving the location and running to a gas pipeline tie-in and water disposal facility at Synergy Operating LLC's Bug #12 Water Disposal Well (API 43-037-30595, NENW Sec. 21, T36S, R26E, SLM, San Juan County, UT).

Let me know if you need any additional information or have any other questions and thanks again for your swift review of this proposed project –

Chris

Chris S. Lopez
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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Thursday, January 30, 2014 12:22 PM
To: clopez@djsimmons.com
Subject: DJ Simmons, Inc, Stateline 22-2 Pad, Tract 57 Sec 22 T39N R20W, Dolores County, Form 2A#400536061 Review

Chris,

I have been reviewing the Stateline 22-2 Pad **Form 2A** (#400536061). COGCC would like to attach the following conditions of approval (COAs) based on the data DJ Simmons, Inc., has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: 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 9 - As required for Groundwater Baseline Sampling; Operator shall comply with Rule **609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING.**

Construction: The following conditions of approval (COAs) will 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 secondary containment for any volume of fluids contained at well site during drilling and completion operations (as described in and shown on the Proposed BMPs 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 44 - The access road will be constructed and maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COA 76 - Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner or equivalent protection) to contain any spilled or released material around permanent crude oil, condensate, and produced water storage tanks.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 11 - A closed loop system must be implemented during drilling, or a lined drilling pit .

COA 38 - The moisture content of any 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 25 – If the well is to be hydraulically stimulated, 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.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface or buried permanent pipelines (poly or steel) are used during operations at the well pad location or nearby well pads:

COA 45 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Southwest Colorado (Steve Labowski; email steve.labowski@state.co.us) 48 hours prior to testing surface or buried poly/steel pipelines.

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 in the area.

COGCC would appreciate your concurrence with attaching these COAs 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

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

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