

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, March 04, 2014 3:51 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Black Hills Plateau Production LLC, Homer Deep Unit 7-23 Pad, NESW Sec 7 T8S R98W, Garfield County, Form 2A (#400527552) and Form 15 (400527727) Review  
**Attachments:** HDU 7-23\_Improvements Buffer.pdf  
**Categories:** Operator Correspondence

**Scan No 2106917      CORRESPONDENCE      2A#400527552**

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**From:** Donahue, Jessica [mailto:[Jessica.Donahue@blackhillscorp.com](mailto:Jessica.Donahue@blackhillscorp.com)]  
**Sent:** Thursday, February 06, 2014 2:48 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: Black Hills Plateau Production LLC, Homer Deep Unit 7-23 Pad, NESW Sec 7 T8S R98W, Garfield County, Form 2A (#400527552) and Form 15 (400527727) Review

Dave,

I have attached a drawing showing a 400 foot buffer from the edges of the pad. I never saw any notification that the buffer had been expanded to 500 feet.

The reference area will be adjacent to the pad to the south.

Black Hills concurs with the COAs as listed below.

Thanks,

Jessica Donahue  
Regulatory Technician  
Black Hills Exploration and Production  
1515 Wynkoop St.  
Suite 500  
Denver, CO 80202  
Phone: 720-210-1333  
Cell: 303-888-4862

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, January 27, 2014 6:00 PM  
**To:** Donahue, Jessica  
**Subject:** Black Hills Plateau Production LLC, Homer Deep Unit 7-23 Pad, NESW Sec 7 T8S R98W, Garfield County, Form 2A (#400527552) and Form 15 (400527727) Review

Jessica,

I have been reviewing the Homer Deep Unit 7-23 Pad **Form 2A** (#400527552) and **Form 15** (#400527727). COGCC would like additional attachments (Revised Location Drawing showing the 500-foot buffer as required since 08-01-13, Reference Area Map, Reference Area Pictures; as outlined below) and would like to attach the following conditions of approval (COAs) based on the information and data Black Hills Plateau Production LLC (Black Hills) has submitted on or attached to the Form 2A and Form 15 prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference area needs to be indicated on a topographic map. In addition, four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (04/05/2011). Another option: **would be to select an area immediately adjacent (i.e., north, west, south, or east) to the well pad as the reference area and indicate this on the Submit Tab (Operator Comments and Submittal).**

**Comments on the Form 2A need to indicate the direction of the Location Picture to be used for the reference area.**

This option requires that the selected location picture shows that the reference area can be distinguished to an area off the pad. In addition, when the operator is using a location picture to define the reference area, the following statement needs to be used: "The reference area is located immediately adjacent to the well pad to the north (as shown on the north Location Picture) on undisturbed ground".

**Rule 303.d.(3).D.:** A scaled drawing, or scaled aerial photograph showing the approximate outline of the Oil and Gas Location and the Well or reference point use for measuring distances. The drawing shall include all visible improvements within five hundred (500) feet of the proposed Oil and Gas Location, with a horizontal distance and approximate bearing from Oil and Gas Location. Visible improvements shall include, but not be limited to, all Building Units, publicly maintained roads and trails, major above-ground utility lines, railroads, pipelines, mines, oil wells, gas wells, injection wells, water wells known to the operator and those registered with the Colorado State Engineer, known springs, plugged wells, known sewers with manholes, standing bodies of water, and natural channels including permanent canals and ditches through which water may flow. A description of surface uses within the **five hundred (500) foot** radius of a proposed Oil and Gas Location, if any, shall be attached to the scaled drawing. If there are no visible improvements within five hundred (500) feet of a proposed Oil and Gas Location, it shall be so noted on the Form 2A. The Location Drawing should show the 500-foot buffer (an actual line on the drawing) measured from the edge of disturbance and any improvements (listed in the rule: pipelines, fences, etc) within 500-feet.

**Planning:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, pit construction (if different than pad construction), pit liner installation, multi-well pit hydrostatic testing, 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; 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.

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

**COA 38** - The moisture content of any drill cuttings in a cuttings 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** - 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 the lined multi-well 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.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface 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](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to testing surface poly or buried 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.

**Construction:** The following conditions of approval (COAs) will apply to both the Form 2A and the Form 15 Pit Permit (for the proposed multi-well pit):

**COA 47** - The multi-well pit must be double-lined (minimum 24 mil thickness for each liner). The pit will also require a leak detection system (Rule 904.e).

**COA 48** - Operator must submit as-built drawings (plan view and cross-sections) of the multi-well pit within 30 calendar days of construction.

**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 49** - For pits containing fluids other than freshwater only; the pit must be fenced. If the pit is not drained, or closure has not begun within 30 days after last use for well completion, the pit must be netted. The operator must maintain the fencing and netting until the pit is closed.

**COA 22** - After installation of the uppermost liner and prior to operating the pit, the synthetic liner(s) shall be tested by filling the pit with at least 70 percent of operating capacity of water, measured from the base of the pit (not to exceed the 2-foot freeboard requirement). The operator shall monitor the pit for leaks for a period of 72 hours prior to either draining the pit or commencing operations. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) 48 hours prior to start of the hydrotest. Hydrotest monitoring results must be maintained by the operator for the life of the pit and provided to COGCC prior to using the pit.

**COA 23** - Surface water samples (one upgradient and one downgradient from the pit/well pad location) from South Dry Fork (if water is present) shall be collected prior to pit use and every 12 months (until pit closure) to evaluate potential impacts from pit operations. At a minimum, the surface water samples will be analyzed for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

**COA 24** - The operator shall submit, and receive approval of, a reuse and recycling plan per Rule 907.a.(3), prior to any offsite reuse/recycling of pit fluids.

**COA 28** - Pits used exclusively for drilling shall be closed in accordance with the 1000-Series Rules. Any pit(s) used for purposes other than drilling shall be closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels; with an approved Site Investigation and Remediation Workplan, Form 27.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A and Form 15 permits prior to passing the OGLA review. In addition, could Black Hills provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location when you receive them. 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

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
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Rifle, CO 81650  
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