

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, March 04, 2014 4:12 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: SWEPI LP, North Hatden 1-26 Pad, SENE Sec 26 T7N R88W, Routt County, Form 2A# 400446461 Review  
**Attachments:** Revised NORTH HAYDEN 1-26 - LOCATION DETAIL.pdf  
**Categories:** Operator Correspondence

**Scan No 2106919      CORRESPONDENCE      2A#400446461**

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**From:** [C-Steven.Compton@shell.com](mailto:C-Steven.Compton@shell.com) [mailto:[C-Steven.Compton@shell.com](mailto:C-Steven.Compton@shell.com)]  
**Sent:** Thursday, February 13, 2014 10:55 AM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Subject:** RE: SWEPI LP, North Hatden 1-26 Pad, SENE Sec 26 T7N R88W, Routt County, Form 2A#400446461 Review

Dave,

Please see the attached map showing a revised Location Drawing Detail (Figure 5A) with the 500-ft radius shown. As you can see, other than the County Road 80, there are no visible improvements in the vicinity of the site. If you have any questions regarding the updated figure please do not hesitate to contact me.

Regarding the list of proposed COAs listed below Shell's only comment is a question as to if both COA 9 and COA 11 should both be included. Shell would propose that only COA 11 be included in the final Form 2A as it appears to contain language very similar to that included in COA 9. If our assessment of this is not correct please let me know. Otherwise Shell accepts the COAs listed.

Regards,

**Steve Compton, P.G.**  
Environmental Engineer - US Onshore Exploration



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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, February 06, 2014 5:35 PM  
**To:** Compton, Steven SEPSCO-UAS/E/USON  
**Subject:** SWEPI LP, North Hatden 1-26 Pad, SENE Sec 26 T7N R88W, Routt County, Form 2A#400446461 Review

Steve,

I have been reviewing the SWEPI LP North Hayden 1-26 Pad **Form 2A** (#400446461). COGCC would like an additional attachment, revised Location Drawing as outlined below, and would like to attach the following conditions of approval (COAs) to the Form 2A based on the information and data SWEPI LP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**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 (not the center of the well pad) and any improvements (listed in the rule: pipelines, fences, etc) within 500-feet. This drawing should fill the entire page to allow for details to be seen.

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

**COA 91** - Notify the COGCC 48 hours prior to start of pad reconstruction, start of construction of the pit (if different), pit liner installation, 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 71** - Operator shall design and construct the access road utilizing all available soils, geologic, landslide, and hydrogeologic information. Operator shall notify the COGCC and the Routt County LGD 48 hours prior to start of access road and pad construction using Form 42 (the appropriate COGCC individuals will automatically be email notified, Operator will need to notify the Routt County LGD ([cbrookshire@co.routt.co.us](mailto:cbrookshire@co.routt.co.us)) for road and pad construction.

**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 9** - Reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system (which operator has indicated on the form 2A) must be implemented during drilling.

**COA 11** - A closed loop system must be implemented during drilling; or, if a drilling pit is constructed, an amended Form 2A must be submitted and a Form 15 submitted if operator plans on using either oil based muds or high chloride/TDS mud. The pit must be lined. All cuttings generated during drilling with oil based muds or high chloride/TDS mud must be kept in the lined drilling pit, or placed either in containers, lined trenches, or on a lined/bermed portion of the well pad; prior to disposition. 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 the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1. All liners associated with drilling mud and cuttings must be disposed of offsite per CDPHE rules and regulations.

**COA 28** - The location is in an area of moderate to high run-on/run-off potential; therefore 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 run-off.

**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 81** - During all construction, drilling, and completion phases at this location, operator shall be monitoring the wildfire potentials daily and have the appropriate additional equipment and measures in place. This may include smoking bans and additional fire fighting equipment. Operator shall consult with the NFS as necessary.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) 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 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.

**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.

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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