

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, March 10, 2014 9:12 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Resend of OXY USA WTP LP, Pond 10 Facility, Tract 83A (SESW) Sec 5 T7S R97W, Garfield County, Form 2A#400561970 Review

**Categories:** Operator Correspondence

**Scan No 2106945      CORRESPONDENCE      2A#400561970**

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Friday, March 07, 2014 1:14 PM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Subject:** FW: Resend of OXY USA WTP LP, Pond 10 Facility, Tract 83A (SESW) Sec 5 T7S R97W, Garfield County, Form 2A#400561970 Review

Joan,

COAs are put on permits to go above and beyond our rules or policies. If the yearly testing is the issue, Oxy indicated in the comment box that they would test annually.

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  
796 Megan Avenue, Suite 201  
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**From:** [Joan Proulx@oxy.com](mailto:Joan.Proulx@oxy.com) [mailto:[Joan.Proulx@oxy.com](mailto:Joan.Proulx@oxy.com)]  
**Sent:** Friday, March 07, 2014 9:40 AM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Subject:** RE: Resend of OXY USA WTP LP, Pond 10 Facility, Tract 83A (SESW) Sec 5 T7S R97W, Garfield County, Form 2A#400561970 Review

Dave:

I have a question regarding Construction COA 22; I am unable to locate the Rule or Policy outlining this COA. Would you please let me know where to find that rule/policy?

Thank you,

Joan

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**From:** Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]

**Sent:** Friday, March 07, 2014 8:15 AM

**To:** Proulx, Joan M

**Subject:** Resend of OXY USA WTP LP, Pond 10 Facility, Tract 83A (SESW) Sec 5 T7S R97W, Garfield County, Form 2A#400561970 Review

Joan,

I have been reviewing the OXY USA WTP LP (Oxy), Pond 10 Facility **Form 2A** (#400561970). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Oxy 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 51** - Conditions of Approval (COAs) attached to the Form 28 Permit will also apply to this Form 2A permit for this location. If there are differences in COA requirements from this Form 2A and the Form 28, the Form 28 COAs will take precedence.

**COA 53** - Prior to the Form 28 permit approval, adequate financial assurance per Rules 704 and 908.11.g.(1)B. are required.

**In addition, this location has been designated a "sensitive area" due to potential shallow groundwater (44' bgs from nearby well located 977' to the north-northwest) and proximity to downgradient surface water (Conn Creek located approximately 376' due east of the pit).**

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

**COA 47** - The multi-well/production 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/production pit within 30 calendar days of reconstruction/refitting.

**COA 39** - No portion of any multi-well/production 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** - The multi-well/production pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed.

**COA 22** - Each year the multi-well/production pit is in operation, 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 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 multi-well/production pit fluids.

**COA 25** - Operator shall stabilize exposed soils and slopes as an interim measure during multi-well/production pit operations at this site.

**COA 74** - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

**COA 28** - The multi-well/production pit 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.

**COA 66** - Delivery and vacuum truck hoses will not be allowed to be placed directly onto the pit liner. If not already installed, operator will construct a loading/unloading station (or equivalent delivery/retrieval system)

located next to the multi-well/production pit, to deliver fluids to or remove fluids from the pit by truck. The loading/unloading station shall be designed and utilized to prevent hoses from being dropped into the pits and dragged over the liner, which could lead to liner damage. The loading/unloading station will be the only permitted access for manual fluids transfers to or from the pit. Vehicles will not be allowed to approach the pit any closer than the loading/unloading station. Each station will have a catch basin in case a leak occurs while operations personnel are connecting or disconnecting hoses. Signs clearly marking the truck loading/unloading station shall be provided and maintained by the operator.

**COA 32** - Surface water samples from Conn Creek (one upgradient and one downgradient to the multi-well/production pit location), located approximately 376 feet to the west of the pit facility (if water is present), shall be collected prior to the multi-well/production 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 analyze for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

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

**COA 25** - If flowback fluids are sent to the multi-well/production pit, those flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline leading to the pit.

**COA 40** - Operator will implement measures to ensure that adequate separation of hydrocarbons from the influent occurs to prevent accumulation of oil on the surface of stored fluids. Operator shall also employ a method for monitoring buildup of phase-separated hydrocarbons on the surface of stored fluids.

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

**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 (poly or steel) 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/steel or buried poly/steel pipelines.

Based on the information provided in the Form 2A by Oxy, COGCC will attach these COAs to the Form 2A permit, Oxy does not need to respond, unless you have questions or concerns with details in this email. 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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