

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, March 18, 2014 4:32 PM
To: dave.kubeczko@state.co.us
Subject: FW: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 143 Pad, NWSW Sec 18 T33N R8W, La Plata County, Form 2A#400498118

Categories: Operator Correspondence

Scan No 2106963 CORRESPONDENCE 2A#400498118

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, March 14, 2014 5:00 PM
To: Terry Lindeman
Cc: Joyce Land Research
Subject: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 143 Pad, NWSW Sec 18 T33N R8W, La Plata County, Form 2A#400498118

Terry,

I have been reviewing the Elm Ridge Exploration Company LLC (Elm Ridge) IGW 143 Pad **Form 2A** #400498118. COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the data Elm Ridge 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 reconstruction/regrading (if necessary), 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).

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

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 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.

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

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.

COA 25 - If the wells are 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 or storage vessel 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 constructed to be sufficiently impervious to contain any spilled or released material and with additional downgradient perimeter berming.

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 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 Labowskie; email steve.labowskie@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 Elm Ridge, COGCC will attach these COAs to the Form 2A permit, Elm Ridge 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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