

## Dave Kubeczko - DNR

---

**From:** Dave Kubeczko - DNR  
**Sent:** Friday, May 30, 2014 11:42 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: WPX Energy Rocky Mountain LLC, Federal RGU 33-25-198 Pad, NWSE Sec 25 T1S R98W, Garfield County, Form 2A#400497846 Review

**Categories:** Operator Correspondence

**Scan No 2107010      CORRESPONDENCE      2A#400497846**

---

**From:** Neifert-Kraiser, Angela [mailto:[Angela.Neifert-Kraiser@wpxenergy.com](mailto:Angela.Neifert-Kraiser@wpxenergy.com)]  
**Sent:** Tuesday, May 20, 2014 1:01 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: WPX Energy Rocky Mountain LLC, Federal RGU 33-25-198 Pad, NWSE Sec 25 T1S R98W, Garfield County, Form 2A#400497846 Review

Hi Dave

Looks like this is good and agreed upon! Thank you

*Angela Neifert-Kraiser*  
303-606-4398  
*Regulatory Specialist*  
*WPX Energy Rocky Mountain, LLC*

*If you are inspired, You can do anything!!*

---

**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, May 19, 2014 5:19 PM  
**To:** Neifert-Kraiser, Angela  
**Subject:** WPX Energy Rocky Mountain LLC, Federal RGU 33-25-198 Pad, NWSE Sec 25 T1S R98W, Garfield County, Form 2A#400497846 Review

Angela,

I have been reviewing the Federal RGU 33-25-198 Pad **Form 2A** (#400497846). COGCC would like to attach the following conditions of approval (COAs) based on the information and data WXP 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, pipeline testing, start of hydraulic stimulation operations, and start of flowback 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 drill 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 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 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 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.

**COA 49** - Operator must routinely inspect the entire length of the surface pipeline to ensure integrity. Operator shall conduct daily inspections of surface poly pipeline routes for leaks during active transfer of fluids and implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located. Inspections shall be conducted by viewing the length of the pipeline; operator will endeavor to minimize surface disturbance during pipeline monitoring. In addition, pump stations along the surface poly or steel pipeline route will be continuously monitored when operating in order to swiftly respond to such a failure.

**COA 54** - Operator must ensure no release of fluids at all stream, intermittent stream, ditch, and drainage crossings. For these crossings: operator will ensure appropriate containment by either installing over-sized pipe "sleeves" which extend the length of the crossing and beyond to a distance deemed adequate to capture and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; or installing over-sized pipe "sleeves" which extend the length of the crossing and installing shut off valves on either side of crossing instead of catchment basins.

**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.

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



Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
Rifle, CO 81650  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

 Please consider the environment before printing this e-mail

