

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, July 23, 2014 5:08 PM
To: Dave Kubeczko - DNR
Subject: FW: Piceance Energy LLC, Piceance 28-11 Pad, NESW Sec 28 T9S R93W, Garfield County, Form 2A #400604661 Review

Categories: Operator Correspondence

Scan No 2107061 CORRESPONDENCE 2A#400604661

From: Wayne Bankert [mailto:wbankert@laramie-energy.com]
Sent: Thursday, May 22, 2014 7:18 AM
To: 'Dave Kubeczko - DNR'
Subject: RE: Piceance Energy LLC, Piceance 28-11 Pad, NESW Sec 28 T9S R93W, Garfield County, Form 2A #400604661 Review

Dave,

Since most of COA's listed are Standard Operations for Piceance Energy, Piceance concurs with adding the COA's to the Form 2A.

Thank you

Wayne P. Bankert
Senior Regulatory & Environmental Coordinator
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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Wednesday, May 21, 2014 3:59 PM
To: Wayne Bankert
Subject: Piceance Energy LLC, Piceance 28-11 Pad, NESW Sec 28 T9S R93W, Garfield County, Form 2A #400604661 Review

Wayne,

I have been reviewing the Piceance 28-11 Pad **Form 2A** (#400604661). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Piceance Energy 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 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 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.

COA 52 – If permanent crude, condensate, and water tanks are placed at the site, operator shall install a steel containment ring around tank batteries to provide secondary containment and install a synthetic liner that underlies the entire battery and is keyed into the top of the containment ring.

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 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.

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.

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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