

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Wednesday, July 23, 2014 5:22 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** FW: Southwestern Energy Production Company (SEPCo), Welker 6-92 1-2H11 Pad, SESE Sec 2 T6N R92W, Moffat County, Form 2A#400615185 Review

Scan No 2107063      CORRESPONDENCE      2A#400615185

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**From:** Kyla Howl [mailto:[khowl@tenv.com](mailto:khowl@tenv.com)]  
**Sent:** Monday, June 30, 2014 3:03 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Cheryl Rowell  
**Subject:** RE: Southwestern Energy Production Company (SEPCo), Welker 6-92 1-2H11 Pad, SESE Sec 2 T6N R92W, Moffat County, Form 2A#400615185 Review

Dave,

Southwestern Energy will accept the COA's you have listed below.

Thank you,  
Kyla

*Kyla Howl*  
Environmental Compliance Specialist  
(505) 635-5669 office  
(720) 808-7735 cell

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Tuesday, June 17, 2014 3:17 PM  
**To:** Kyla Howl  
**Subject:** Southwestern Energy Production Company (SEPCo), Welker 6-92 1-2H11 Pad, SESE Sec 2 T6N R92W, Moffat County, Form 2A#400615185 Review

Kyla,

I have been reviewing the Welker 6-92 1-2H11 Pad **Form 2A** (#400615185). COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the information and data SEPCo 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 (if different than 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 (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. Since this location is at the high point of a hill, and salt-based and oil-based drilling muds are being used, run-off stormwater BMPs need to be sufficient to keep all fluids onsite.

**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. All liners associated with drilling mud and cuttings must be disposed of offsite per CDPHE rules and regulations.

**COA 44** - The access road will be constructed 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.

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

**COA 25** - If the well(s) is(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.

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

**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 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 pipelines. This will reduce surface disturbance.

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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