

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, July 29, 2014 3:08 PM
To: Dave Kubeczko - DNR
Subject: FW: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 154 Pad, SWNW Sec 15 T33N R9W, La Plata County, Form 2A#400607018

Categories: Operator Correspondence

Scan No 2107085

OPERATOR COA CORRESPONDENCE

2A#400607018

From: Terry Lindeman [mailto:TLindeman@elmridge.net]
Sent: Tuesday, July 29, 2014 2:51 PM
To: Dave Kubeczko - DNR
Cc: Joyce Land Research
Subject: RE: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 154 Pad, SWNW Sec 15 T33N R9W, La Plata County, Form 2A#400607018

Dave:

The COA's are acceptable to Elm Ridge with the exception of COA 49. No H2S has ever been encountered in that area. Your attention to this APD and others is greatly appreciated.

Thanks

Terry Lindeman

District Superintendent

Elm Ridge Exploration Co. LLC

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, July 29, 2014 1:34 PM
To: Terry Lindeman
Cc: Joyce Land Research; Mike Finney; Anne Finney
Subject: FW: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 154 Pad, SWNW Sec 15 T33N R9W, La Plata County, Form 2A#400607018

Terry,

COGCC (Dave Kubeczko), Elm Ridge's permitting agent (Doug Joyce), and the surface owner (Krysten Moore) met onsite at Elm Ridge Exploration Company LLC (Elm Ridge's) proposed IGW 154 Pad on 06-19-14 to discuss surface owner concerns. At this onsite several safety and environmental issues were discussed. The following is a comment from Krysten Moore that was received by COGCC via email on 07-16-14. COGCC responded to the surface owner's concerns on 07-21-14 on the Comment Tab of the Form 2A Permit. These responses (indicated below in "CAPITAL LETTERS") are listed below:

From: Krysten Moore [mailto:krystenm245@gmail.com]
Sent: Tuesday, July 08, 2014 1:53 PM
To: dave.kubeczko@state.co.us

Subject: Elm Ridge IGW 154 Safety/Health/Environment Concerns

Dave-

Most of my concerns have to do with the increase of traffic and new equipment which poses many safety hazards for my family, pets and the local wildlife. I will try and put down my biggest concerns one item at a time so they can be understood as easily as possible.

1) I would like a speed limit sign of 10 mph and a caution children at play sign to be posted on the back road that is the main access to the location. Due to the thickness of the trees and close proximity to my house I think it necessary to make people aware that children and pets could possibly pop out of the trees at any moment. I think signs would help cut down on a chance of an accident.

"OPERATOR WILL PLACE 15 mph SPEED LIMIT SIGNS and AT LEAST TWO CHILDREN AT PLAY SIGNS (one each direction) ON THE ROAD DISCUSSED ABOVE."

2) Any equipment with moving parts, possible release of high pressure and equipment that may be hot needs to be fenced for safety. The fencing should be chain link at the very least so as not to allow small hands or small animals in. A gate going up the ladders to the tanks or any other tall equipment with a ladder needs to be installed to minimize fall hazards. Locks would also be needed on any gates accessing the equipment.

"OPERATOR WILL FENCE ANY EQUIPMENT WITH MOVING PARTS AND TANKS THAT CAN BE ACCESSED FROM THE WELL PAD. OPERATOR WILL PLACE 'KEEP OUT' SIGNS AROUND THE WELL PAD, PARTICULARLY ALONG THE SOUTH AND WEST EDGES OF THE WLL PAD (the closest part of the pad to the building unit)."

3)Any berms, containments or equipment that could possibly hold water needs to be fenced so as not to create a drowning hazard for my children, animals or local wildlife. Again it needs to be fencing that my children cannot easily climb and with holes small enough they cannot fit through it: chain link or better.

'ADDRESSED IN No. 3 ABOVE. PARENTS SHOULD ADVISED THEIR CHILDREN THAT THEY ARE NOT ALLOWED ON THE WELL PAD DURING DRILLING AND COMPLETION OPERATIONS, AS WELL AS AFTER THE WELLS ARE IN PRODUCTION"

4) Dust could be an issue with increased traffic as well. My youngest daughter has asthma so the dust needs to be mitigated as much as possible. Gravel, water down the roads, whatever they can do. We normally get little to no traffic on that road so this will be a new situation for us.

"OPERATOR WILL CONTROL DUST DURING CONSTRUCTION, DRILLING, AND COMPLETION OPERATORS. DUST CONTROL WILL BE DONE AS NEEDED DURING PRODUCTION OPERATIONS."

5) The original copy of the permit I received said H2S would be possible. I have been researching this gas and it looks like it could even be deadly in some cases. Could they place gas analyzers of some kind on location that would alarm and/or give visual warning of the presence of H2S or any other harmful gas? That way my family would know to stay away and upwind from the location.

"OPERATOR HAS CORRECTED THE FORM 2A TO INDICATE THAT H2S IS NOT EXPECTED."

6) I am very concerned about the fire hazards due to the extreme dry ground and plants we have up there. Any cigarette butt or even hot exhaust from a vehicle could start a fire. I am not sure what can be done to mitigate this concern. No smoking signs could maybe be posted. Also signs indicating that they should not park, drive or idle their vehicles off the road or well pad. Which they shouldn't be doing anyway but we all know how people can get when unsupervised or rushed. Simple reminders could prevent accidents or negligence.

"FIRE PREVENTION IS COVERED UNDER COGCC's RULES AND WILL BE ENFORCED AT THIS LOCATION. IN ADDITION, OPERATOR WILL ENSURE THAT SMOKING BE ALLOWED IN

DESIGNATED AREAS ON THE WELL PAD LOCATION, AWAY FROM THE RIG AND WITHIN THE PAD BERMED AREA. VEHICLES WILL ONLY BE PARKED WITHIN THE WELL PAD BOUNDARIES."

7) There is an arroyo just northeast of the location that wildlife frequently visit when it does rain. I would like special attention to be paid to be sure that the local ecosystem there is not disturbed and that there is sufficient protection against contamination of the rain water that will travel to the arroyo in and around the well location. "COGCC HAS ALREADY ADDRESSED THIS CONCERN WITH FLUID CONTAINMENT, SPILL RELEASE, AND STORMWATER COAs."

8) I am planning on having a water well drilled in the near future and I am concerned about ground water contamination. Has the existing well been tested to be sure there is no communication between the well and the ground around? Will there be extra measures put in place to be sure this new well will not contaminate the area? "COGCC REVIEWS EACH NEW WELL AND ALL SURROUNDING WATER WELLS TO DETERMINE THE DEPTH OF SURFACE CASING (FOR THE PROPOSED) GAS WELL REQUIRED IN ORDER TO PROTECT POTABLE WATER AQUIFERS NOW, AS WELL AS, IN THE FUTURE."

Those are my main concerns right now. I have not been exposed to this type of construction and well drilling before so I hope that I have done my research enough that these concerns I have outlined will be enough to cover the major hazards and keep my family safe as much as possible. If I think of anything else I will let you know. Thank you for your time.

-Krysten Moore
Land Owner at 730 Blackhawk Trl, Ignacio, CO

"COGCC HAS RESPONDED TO THE ABOVE COMMENTS ON 07-21-14; THE SURFACE OWNER COMMENT PERIOD ENDED ON 07-19-14."

Based on the surface owner's concerns and COGCC's review of the comments submitted, COGCC would like to attach the following additional conditions of approval (COAs) to the Elm Ridge Exploration Company LLC (Elm Ridge) IGW 154 Pad **Form 2A** #400607018 prior to passing the Oil and Gas Location Assessment (OGLA) review.

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

COA 81 - Operator will place "15 MPH SPEED LIMIT" signs and at least two (2) "CHILDREN AT PLAY" signs (one each direction) on the back road that is the main access to the location. During all well pad operations, the gate at the entrance of the well pad will be locked.

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

COA 44 - The access road will be 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 28 - The location is in an area of moderate run-on/run-off potential; therefore standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater run-off, especially toward the drainage located to the northeast of the well pad location.

COA 82 - Operator will fence any equipment with moving parts and any permanent crude, condensate, or produced water tanks with berms that can be accessed from the well pad. Operator will place and maintain "Keep Out" signs around the well pad, particularly along the south and west edges of the well pad (the closest part of the pad to the building unit).

COA 83 - Operator will place sound mitigation around the pump jack (if installed) in the direction of nearby building units in order to comply with the requirements in Rule 802. Noise Abatement.

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

COA 84 - Operator will ensure that smoking be allowed in designated areas on the well pad location, away from the rig and within the pad bermed area. Vehicles will only be parked within the well pad boundaries.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, Elm Ridge needs to submit a letter to COGCC certifying that they have met the requirements in **Rule 306.e. Meetings with Building Unit Owners Within a Buffer Zone Setback**. If you have any questions, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist
Western Colorado



Colorado Oil & Gas Conservation Commission
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796 Megan Avenue, Suite 201
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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, June 17, 2014 10:34 AM
To: Terry Lindeman
Cc: Joyce Land Research
Subject: Elm Ridge Exploration Company LLC (Elm Ridge), IGW 154 Pad, SWNW Sec 15 T33N R9W, La Plata County, Form 2A#400607018

Terry,

I have been reviewing the Elm Ridge Exploration Company LLC (Elm Ridge) IGW 154 Pad **Form 2A #400607018**. 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, 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).

COA 49 - All personnel must be H₂S trained and proper air monitoring for H₂S must be implemented during drilling, completion, and production operations. Emergency response plan for H₂S must be onsite at all times.

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. Operator must ensure that any run-off protection along the northeast edge of the well pad be sufficient to protect the drainage adjacent to this location.

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.

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated as to not impact nearby residences.

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.

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](tel:9703092514) (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist
Western Colorado



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