

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, March 23, 2015 5:49 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: WPX Energy Rocky Mountain LLC, Federal RGU 13-36-198 Pad, Lot 12 (NWSW) Sec 36 T1S R98W, Rio Blanco County, Form 2A#400632483 Review

**Categories:** Operator Correspondence

**Scan No 2107307      CORRESPONDENCE      2A#400632483**

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**From:** Haddock, Reed [mailto:[Reed.Haddock@wpxenergy.com](mailto:Reed.Haddock@wpxenergy.com)]  
**Sent:** Thursday, March 13, 2015 2:29 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Neifert-Kraiser, Angela  
**Subject:** RE: WPX Energy Rocky Mountain LLC, Federal RGU 13-36-198 Pad, Lot 12 (NWSW) Sec 36 T1S R98W, Rio Blanco County, Form 2A#400632483 Review

Dave:

WPX is fine with the attached COA's. Thanks Reed

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, March 13, 2015 1:48 PM  
**To:** Haddock, Reed  
**Subject:** FW: WPX Energy Rocky Mountain LLC, Federal RGU 13-36-198 Pad, Lot 12 (NWSW) Sec 36 T1S R98W, Rio Blanco County, Form 2A#400632483 Review

Reed,

Can you review this one for Angela?

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

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, March 13, 2015 1:35 PM  
**To:** Neifert-Kraiser, Angela  
**Subject:** WPX Energy Rocky Mountain LLC, Federal RGU 13-36-198 Pad, Lot 12 (NWSW) Sec 36 T1S R98W, Rio Blanco County, Form 2A#400632483 Review

Angela,

I have been reviewing the Federal RGU 13-36-198 Pad **Form 2A** (#400632483). The Construction Layout Drawings attachment is missing. COGCC would like to attach the following conditions of approval (COAs) based on the information and data WPX Energy Rocky Mountain LLC (WPX) 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, start of hydraulic stimulation operations, start of flowback operations (if different than hydraulic stimulation), and pipeline testing 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 after significant precipitation events), and maintained in good condition.

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

**COA 38** - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. After drilling and completion operations have been completed, the drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must meet the applicable standards of Table 910-1. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location. No offsite disposal of cuttings to another oil and gas location shall occur without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. Commercial disposal of drill cuttings will only require notification to COGCC via a Form 4 Sundry Notice.

**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.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A if any temporary surface or buried pipelines (poly or steel) are used during operations at the frac 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.

COGCC would appreciate your concurrence with attaching the COGCC 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



**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

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)

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