

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Friday, September 18, 2015 1:59 PM
To: dave.kubeczko@state.co.us
Subject: FW: WPX Energy Rocky Mountain LLC, WPX SG 23-32 Pad, NESW Sec 32 T7S R96W, Garfield County, Form 2A#400860782 Review

Categories: Operator Correspondence

Scan No 2107642 OPERATOR CORRESPONDENCE 2A#400860782

From: Neifert-Kraiser, Angela [mailto:Angela.Neifert-Kraiser@wpxenergy.com]
Sent: Thursday, September 10, 2015 5:13 PM
To: Dave Kubeczko - DNR
Subject: FW: WPX Energy Rocky Mountain LLC, WPX SG 23-32 Pad, NESW Sec 32 T7S R96W, Garfield County, Form 2A#400860782 Review

Hi Dave

April sent the following information. So looks like we are good to go! Thank you

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

If you are inspired, You can do anything!!

From: Mestas, April
Sent: Thursday, September 10, 2015 3:51 PM
To: Neifert-Kraiser, Angela
Cc: Fechino, Ashlee
Subject: FW: WPX Energy Rocky Mountain LLC, WPX SG 23-32 Pad, NESW Sec 32 T7S R96W, Garfield County, Form 2A#400860782 Review

Hi Angela,
These COAs look ok. The only caveat is that we have submitted water analytical for the Coz/Cor already and will provide analytical of the Rollins (if we decide to complete). We are communicating with Bob on this already but should let Dave K. know so it might not have to be a condition of the Form 2 that requires a follow up via the Form 2 process. We are working through this with the UIC process.

Thank you!
April

From: Mestas, April
Sent: Thursday, September 10, 2015 9:49 AM
To: Blaney, Karolina; Fechino, Ashlee; Carter, Peggy; Lobato, Joe; Hoover, Daniel; Bundick, Jason; Rider, Kent; Shoemaker, Mike; Danforth, Brandon; Gardner, Michael
Subject: Fwd: WPX Energy Rocky Mountain LLC, WPX SG 23-32 Pad, NESW Sec 32 T7S R96W, Garfield County, Form 2A#400860782 Review

These look pretty normal I think. Let me know if you can't live with these. Thanks!!

April

Sent from my iPhone

Begin forwarded message:

From: Dave Kubeczko - DNR <dave.kubeczko@state.co.us>
Date: September 10, 2015 at 9:24:50 AM MDT
To: <Angela.Neifert-Kraiser@wpxenergy.com>
Cc: "Fechino, Ashlee" <Ashlee.Fechino@wpxenergy.com>, "Mestas, April" <April.Mestas@wpxenergy.com>
Subject: WPX Energy Rocky Mountain LLC, WPX SG 23-32 Pad, NESW Sec 32 T7S R96W, Garfield County, Form 2A#400860782 Review

Angela,

I have been reviewing the WPX SG 23-32 Pad **Form 2A** (#400860782). 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, 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 tank site during operations (as shown on the Proposed BMPs attachment); 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.

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.

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

COA 38 - The moisture content of water/bentonite based mud (WBM) generated 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 WBM 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 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 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 will implement BMPs necessary to mitigate a potential for a release of fluids to impact streams, intermittent streams, ditches, and drainage crossings. For these crossings: if poly pipe is used on the surface, 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 (catchment basins) and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; 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; or develop an alternative means for containment. For all other pipeline materials, operator will implement BMPs necessary to mitigate a potential for E&P fluids not to reach groundwater or flowing surface water.

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 temporary surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

Underground Injection Control (UIC): The following conditions of approval (COAs) will apply to the proposed injection well WPX SG 914-32D and any temporary or permanent equipment onsite used for injection:

COA 2 - Approval of this Form 2A and the Form 2 for the injection well (Form 2#400872301) does not authorize operator the right to inject. Authorization to inject into the selected Formation(s) requires approval of both the Form 31 and the Form 33.

COA 46 - Operator will use qualified containment devices for all appropriate chemicals/hazardous materials and injection equipment (pumps) used onsite during the operation of the injection well.

COA 41 - All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure a minimum of 110 percent secondary containment for the largest structure containing fluids within each bermed area at the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

COA 51 - Operator shall equip and maintain on all tanks an electronic level monitoring device.

COA 22 - Unless otherwise determined by COGCC staff that a water sample of the proposed injection formation is not required, before hydraulic stimulation of the injection well, operator shall collect a groundwater sample from the Iles Formation and the Rollins-Cozzette-Corcoran Formation and analyze for total dissolved solids (TDS); submit laboratory analytical results to COGCC (emails: bob.koehler@state.co.us and arthur.koelspell@state.co.us).

COGCC would appreciate your concurrence with attaching the COGCC COAs to the Form 2A permit prior to passing the OGLA review. COGCC can approve this form with a timely response from WPX. 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
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796 Megan Avenue, Suite 201
Rifle, CO 81650
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