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Matthew Lepore, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

RE: RWSU – Variance to Rule 603.h. (2)

Dear Director Lepore,

Chevron USA, INC (#16700) is the operator of the Rangely Weber Sand Unit (COC47675X) in Northwest Colorado and is requesting a 502.b exception variance to the Colorado Oil and Gas Rule 603.h. (2) in regards to the requirement to anchor all existing tanks and abandon operation of all existing pits within the defined floodplain. Chevron has identified multiple assets within the floodplain that require compliance with the rule and Chevron is actively working toward compliance. However, this letter is issued to request a temporary variance for Chevron's Collection Station 47, and to provide the Director with an alternative compliance plan in order to meet the requirements of Rule 603.h (2) for the assets attached to this site.

At Chevron Collection Station 47, Chevron has identified one 12' Diameter x 15' Tall 300 BBL Produced Water Tank and one Emergency Overflow Pit #102571 (approximately 2,300 BBL) as shown in Figure 1 below that will not meet the April 1, 2016 deadline. The abandonment of both the Tank and the Pit are tied to a decision on issuance of Colorado Department of Public Health and Environment (CDPHE) Air Permit application 95RB377 that is currently under review. Plans are in place to proceed with removal of the produced water tank and abandonment and remediation of the emergency overflow pit as soon as application approval is given.

Therefore, Chevron respectfully requests approval for the following:

- To waive the requirement of anchoring the produced water tank with the understanding that it will be managed as part of the overall floodplain management standard operation procedures being developed, and removed from service upon approval of the Air Permit.
- To extend the deadline for removal of Emergency Overflow Pit #102571 to allow for approval of the Air Permit application and to provide Chevron adequate time to abandon and remediate the pit in accordance with COGCC Rules 905 & 1000.



Figure 1 – Rangely Weber Sand Unit Collection Station 47



Chevron as Operator of the RWSU fully intends to meet all other requirements as outlined by Rule 603.h. (2). Furthermore, notification to the Director shall be given when the above mentioned tank and pit are removed from service, as well as an update to the Floodplain Inventory List on file.

If you have any questions concerning this Alternative Compliance Plan, please feel free to contact me at (970)-257-6023 or moose.adams@chevron.com.

Regards,

Micah "Moose" Adams

Rangely Lead Facility Engineer

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