

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Friday, February 05, 2016 8:54 AM
To: 'dave.kulmann@state.co.us'
Subject: FW: <EXTERNAL> SandRidge Exploration & Production LLC, Mutual 01-17H Pad, NWNW Sec 17 T7N R80W, Jackson County, Form 2A#400958753 Review

Categories: Operator Correspondence

Scan No. 2107760 CORRESPONDENCE 2A#400958753

From: Spence Laird [mailto:slaird@sandridgeenergy.com]
Sent: Friday, February 05, 2016 5:43 AM
To: Dave Kubeczko - DNR
Subject: RE: <EXTERNAL> SandRidge Exploration & Production LLC, Mutual 01-17H Pad, NWNW Sec 17 T7N R80W, Jackson County, Form 2A#400958753 Review

SandRidge will adhere to the policies of the COGCC.

Thank you!

Spence Laird



From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Thursday, February 04, 2016 6:01 PM
To: Spence Laird
Subject: <EXTERNAL> SandRidge Exploration & Production LLC, Mutual 01-17H Pad, NWNW Sec 17 T7N R80W, Jackson County, Form 2A#400958753 Review

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Spence,

COGCC requests that SandRidge review the attached policy (**NOTICE TO OPERATORS, Rule 912. VENTING OR FLARING PRODUCED NATURAL GAS – STATEWIDE, January 12, 2016**) and the following rule about venting and flaring:

912. VENTING OR FLARING NATURAL GAS

- a. The unnecessary or excessive venting or flaring of natural gas produced from a well is prohibited.
- b. Except for gas flared or vented during an upset condition, well maintenance, well stimulation flowback, purging operations, or a productivity test, gas from a well shall be flared or vented only after notice has been given and approval obtained from the Director on a Sundry Notice, Form 4, stating the estimated volume and content of the gas. The notice shall indicate whether the gas contains more than one (1) ppm of hydrogen sulfide. If necessary to protect the public health, safety or welfare, the Director may require the flaring of gas.
- c. Gas flared, vented or used on the lease shall be estimated based on a gas-oil ratio test or other equivalent test approved by the Director, and reported on Operator's Monthly Report of Operations, Form 7.

- d. Flared gas that is subject to Sundry Notice, Form 4, shall be directed to a controlled flare in accordance with Rule 903.b.(2) or other combustion device operated as efficiently as possible to provide maximum reduction of air contaminants where practicable and without endangering the safety of the well site personnel and the public.
- e. Operators shall notify the local emergency dispatch or the local governmental designee of any natural gas flaring. Notice shall be given prior to flaring when flaring can be reasonably anticipated, or as soon as possible, but in no event more than two (2) hours after the flaring occurs.

In addition, COGCC would like to attach to the Form 2A the following conditions of approval (COAs) based on the information and data Black Hills 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 - In addition to the notifications required by COGCC listed in the **Northwest Notification Policy (Notice of Intent to construct a new location, Notice of Intent to install a pit liner, Notice of Intent to spud surface casing, and Notice of Intent to commence hydraulic fracturing operations)** and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to pipeline testing (flowlines from wellheads to separators to tanks; and/or any temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

COA 96 - Operator must adhere to all COAs that were previously agreed to by EE3 for this location - OGCC ID#324757 (previously submitted and approved [09-12-14] Form 2A#400593227). These include notification, fluid containment, spill/release BMPs, flowback to tanks, tank berming, cuttings management, cuttings low moisture content, and reference area pictures within 12 months.

Drilling/Completions: The following condition of approval (COA) will apply:

COA 33 - Operator shall follow all requirements of COGCC's current policy - **NOTICE TO OPERATORS, Rule 912. VENTING OR FLARING PRODUCED NATURAL GAS – STATEWIDE, dated January 12, 2016**; and to **Rule 912. VENTING OR FLARING NATURAL GAS. a. thru e.** in regards to venting and flaring.

Please respond to this email indicating that you have read the policy and rules concerning venting and flaring and will adhere to both. COGCC would also appreciate your concurrence with attaching these additional COAs to the Form 2A prior to final approval. 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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