STATE OF COLORADO

Santovena - DNR, Crystal <crystal.santovena@state.co.us>

Fwd: Argenta 34-10 31-1; 05-067-08199 - Reclamation Plan

1 message

Roy - DNR, Catherine <catherine.roy@state.co.us>   Thu, Dec 8, 2016 at 10:06 AM
To: Crystal Santovena - DNR <crystal.santovena@state.co.us>

Hello Crysal,

Could you upload the following email correspondence to the well file for the 067-08199 API Number and location?

The attachment documents some corrective actions completed. Could we label this as: "**COGCC Response to Reclamation Plan**"?

Here is the information from the card:
Name and Date: Catherine Roy/December 8, 2016
Projects: **ConocoPhillips Reclamation at 067-08199**
Facilities: Abandoned Location
Other:
Enter in Database? Yes
Needs Scanning? No
Index Doc? I'm not sure
Return to Office: No
File in Public Room? No

Thank you very much!

---------- Forwarded message ----------
From: **Roy - DNR, Catherine** <catherine.roy@state.co.us>
Date: Fri, Jun 19, 2015 at 1:11 PM
Subject: Argenta 34-10 31-1; 05-067-08199 - Reclamation Plan
To: Dollie.L.Busse@conocophillips.com, lori.r.notor@cop.com, Denise Arthur - DNR <Denise.Arthur@state.co.us>

Ms. Notor and Ms. Busse,

We have reviewed the reclamation plan provided for the ConocoPhillips 067-08199 location and have the following comments. We have determined that the initial draft does not sufficiently address reclamation for the location. Therefore, we are requesting significant changes to the Reclamation Plan that will require amended information in response to these comments with a corrective action date of June 30, 2015.

Here are the comments:

1. The entire project area needs to be recontoured and reclaimed. This includes areas not proposed for reclamation in the plan such as the eastern portion of the well pad, the diverted stream channel along the northern edge of the project area and the small corner of the well pad north of the current stream channel in the northeastern corner of the project area. Please amend the report and include recontouring and reclamation of the entire project area.

2. In several places the word "should" is used when stating that a necessary action will be completed. The term "should" needs to be replaced with "will" in instances that the action will be completed. Please amend as appropriate.

3. How will the stream that was diverted over the northern portion of the project area be contoured and stabilized?

4. Maps show that both waterways are considered Wetlands or Waters of the U.S. Please provide documentation as

to consultation with the U.S. Army Corps of Engineers as to the regulatory status of these waterways and if permitting is required for the work, then copies of the permit documentation will be needed.

5. On page 8 under "Final Site Stabilization and Long term Stormwater Quality", it says that final stabilization is achieved when a uniform cover of 70 percent pre-disturbance is achieved. This should specify that this is to CDPHE standards and COGCC requires 80 percent of pre-disturbance or reference area cover to clarify the difference between the two.

6. The report states that stormwater inspections will not be completed when there is snow cover, please indicate how it will be determined that inspections will resume so that snow melt events can be evaluated.

7. It is unclear if the report is proposing that weeds only be treated within the area mapped as the "infestation area"? Noxious weeds were observed throughout the project area and therefore need to be controlled throughout.

8. In the event that weeds such as kochia or Russian thistle that are not noxious, but competitive with desirable vegetation become established, how will these be managed? This is necessary because aggressive weeds will often compete with desirable vegetation and impede upon achievement of the 80 percent revegetation goal.

9. Recontouring should not be completed "to the extent practicable". Recontouring needs to be completed as "close to the original contour as practicable" throughout the project area as stated in the final reclamation rules.

10. According to the reclamation rules, decompaction should be conducted to a minimum depth of 18 inches (or to bedrock layer if shallower) as opposed to 12 inches which is proposed on page 6 of plan.

11. The proposed dryland pasture seed mix is not appropriate for this location. This location is not pasture and the dryland seed mix is largely non-native species. The Foothills Native seed mix is closer to an appropriate mix. Please amend report with appropriate seed mix and omit the inappropriate seed mix.

12. Typically, we do not recommend use of a cover crop such as QuickGuard. Often the cover crop will rapidly establish and can out-compete desirable species. COGCC would not use this method; however, we cannot require that you do not to use this method.

13. COGCC does not separate between "enforceable" and "non-enforceable" noxious weeds. Noxious weeds need to be controlled on the location until it passes final reclamation.

14. Monitoring of weeds and revegetation progress is not sufficiently described. Will it be conducted at the same time as SWMP inspections? Not clear as to frequency of SWMP inspections. Someone experienced in weed identification and vegetation assessment needs to be present to identify weed species and revegetation should be monitored.

15. Weeds need to be monitored and controlled until location passes final reclamation. The provided SWMP Inspection sheet does not identify that weeds will be monitored.

Thank you for your continued correspondence and compliance.

Sincerely,

Catherine Roy

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Catherine Roy
Southwest Reclamation Specialist

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