

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, May 23, 2017 9:08 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** Bonanza Creek Energy Operating Company LLC (Bonanza Creek), Walden Land Treatment Facility T7-P18, NENE Sec 18 T9N R78W, Jackson County\_Form 2A #401220986 Review and CPW BMPs

**Categories:** Operator Correspondence

Scan No. 2108154      CORRESPONDENCE      2A #401220986

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**From:** Brian Dodek [mailto:[BDodek@bonanzacrk.com](mailto:BDodek@bonanzacrk.com)]  
**Sent:** Tuesday, May 22, 2017 9:52 AM  
**To:** Dave Kubeczko - DNR  
**Cc:** Julie Vigil  
**Subject:** RE: Bonanza Creek Energy Operating Company LLC (Bonanza Creek), Walden Land Treatment Facility T7-P18, NENE Sec 18 T9N R78W, Jackson County\_Form 2A #401220986 Review and CPW BMPs

The current verbiage is acceptable.

Thanks,  
Brian

### Brian Dodek, P.G.

Supervisor – Surface Environmental Management

Direct: 720-225-6653  
Mobile: 303-483-5486



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**From:** Brian Dodek [mailto:[BDodek@bonanzacrk.com](mailto:BDodek@bonanzacrk.com)]  
**Sent:** Sunday, May 21, 2017 1:58 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Julie Vigil  
**Subject:** Re: Bonanza Creek Energy Operating Company LLC (Bonanza Creek), Walden Land Treatment Facility T7-P18, NENE Sec 18 T9N R78W, Jackson County\_Form 2A #401220986 Review and CPW BMPs

Thanks Dave. We'll get the map submitted tomorrow. Have a good rest of your weekend.

Sent from my mobile office.

**Brian Dodek, P.G.**

Supervisor - Surface Environmental Management

Bonanza Creek Energy, Inc.

410 17<sup>th</sup> Street, Suite 1400

Denver, CO 80202

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On May 21, 2017, at 1:45 PM, Dave Kubezko - DNR <[dave.kubezko@state.co.us](mailto:dave.kubezko@state.co.us)> wrote:

Brian, I have made revisions to the wildlife COAs below per your suggestions and made clarifications about site operations (time restrictions during certain seasons which will allow soil treatment to take place, weather permitting). Please review and concur if you agree. I still need the 'Hydrology Map' attachment. Thanks. Dave K.

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**From:** Brian Dodek [mailto:[BDodek@bonanzacrk.com](mailto:BDodek@bonanzacrk.com)]

**Sent:** Sunday, May 21, 2017 10:10 AM

**To:** Dave Kubezko - DNR

**Cc:** Julie Vigil

**Subject:** Re: Bonanza Creek Energy Operating Company LLC (Bonanza Creek), Walden Land Treatment Facility T7-P18, NENE Sec 18 T9N R78W, Jackson County\_Form 2A #401220986 Review and CPW BMPs

Dave,

This is a very small facility. Your verbiage for use of 2 or more pods requiring re-fencing of the whole facility is concerning. We may have to move over and work soils on another pod due to muddy conditions. All pods are also tilled on a routine basis during the summer to ensure biodegradation of existing soil within the pods. Can we remove this language and rely on the verbiage for wildlife evidence in the pods to move prompt evaluation of additional fencing?

Now that we are noticing soils work at the facility the COGCC should be able to sufficiently monitor conditions at the location without reducing our ability to operate within a 200 ft box that is already fenced and bermed.

The timing stip, as written, now shortens our soil treatment window by as many as two months. If we now have less time to work the soil, I would appreciate full use of the four pods if necessary without re-fencing the entire facility. CPW was happy with us installing hi-viz wire on the existing fence.

Feel free to call if you wish to discuss in more detail.

Thanks

Brian

Sent from my mobile office.

**Brian Dodek, P.G.**

Supervisor - Surface Environmental Management

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On May 21, 2017, at 8:52 AM, Dave Kubezko - DNR <[dave.kubezko@state.co.us](mailto:dave.kubezko@state.co.us)> wrote:

Brian and Julie,

I have been reviewing the Bonanza Creek Energy Operating Company LLC (Bonanza Creek), Walden Land Treatment Facility T7-P18 **Form 2A #401220986**. COGCC requests another version of the 'Hydrology Map' attachment, the current version will not open in eForms. COGCC would like to attach the following conditions of approval (COAs) based on the information and data Bonanza Creek and CPW have 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) and Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (c. Notice of Construction or Major Change); operator shall notify the COGCC 48 hours prior to Wildlife high visibility wire installation and addition of any soils or tank bottoms requiring placement in the treatment pods 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 92** - Operator shall provide a Reference Area Map and four (4) color photographs of the Reference Area, taken during the growing season of vegetation and facing each cardinal direction, within twelve (12) months after approval of the Form 2A permit. Each photograph shall be identified by date taken, well or Oil and Gas Location name, and direction of view..

**General Form 28 Permit COAs:** The following conditions of approval (COAs) will apply:

**COA 28a** - Conditions of Approval (COAs) attached to the Form 28 Permit will also apply to this Form 2A permit for this location.

**COA 28b** - Commencement of new building/construction on this location is not authorized until the Form 28 permit has been approved.

**COA 28c** - Prior to the Form 28 permit approval (and therefore start of any construction), adequate financial assurance per **Rules 704 and 908.11.g.(1)B. are required.**

**Wildlife:** The following conditions of approval (COAs) will apply to the land treatment facility for protection and minimization of impacts to wildlife (big game Mule Deer and Elk, and Greater Sage Grouse). These COAs were discussed during the Wildlife Onsite Consultation on 04-04-17, subsequent emails, and phone conversations with CPW personnel.

**WLD 1** - Operator shall install a high visibility, vinyl-coated top wire on the top of the existing 4-foot tall wooden and steel post, barbed wire fence which will make the fence more visible to big game and greater sage grouse.

**WLD 2** - Operator shall monitor the facility on a regular basis to determine if wildlife are getting into the treatment pods. If there is evidence of wildlife activity, the operator shall install a 6-foot woven-wire fence around the area where the contaminated soils will be stored. The purpose of the fence is to ensure that big game animals (e.g., elk, mule deer and antelope) can not enter the facility and come into contact with contaminated soils, tank bottoms, etc. In addition, a high visibility, vinyl-coated top wire will be installed which will make the fence more visible to big game and greater sage grouse.

**WLD 3** - Within the land treatment facility, operator agrees to avoid construction-related activities which would require the use of heavy equipment (e.g., bulldozer, scraper, dump truck, front end loader, etc.) to conduct Form 28 required construction activities, such as building additional berms and ditches, during a period of time between March 1 and end on May 31.

**WLD 4** - Operator and contractors will restrict land treatment facility daily visits to twice a day and to portions of the day between 9:00 AM and 4:00 PM during the winter season (December 1 through April 15) for impact minimization for big game and during the spring season (March 1 through June 30) for greater sage grouse.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. COGCC can approve this form with a timely response from Bonanza Creek. 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

<image001.jpg>

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
Rifle, CO 81650  
FAX: (970) 625-5682  
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[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**From:** Brian Dodek [mailto:[BDodek@bonanzacrk.com](mailto:BDodek@bonanzacrk.com)]  
**Sent:** Tuesday, May 02, 2017 6:21 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Julie Vigil  
**Subject:** CPW BMPs

Dave,  
I spoke with Josh this afternoon. We agreed that BCEOC will install a high visibility top line on the perimeter fence. We will also agree to postpone heavy equipment work

until 6/30/17. I know you also spoke with Josh in the field. I appreciate your help in discussing the suggested CPW BMPs.

Let me know if we need to do anything to help complete the 2A process.

Thanks,  
Brian

**Brian Dodek, P.G.**

Supervisor – Surface Environmental Management

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