

Approval

Signed: _____

Matthew Lee

Title: _____

Director of COGCC

Date: _____

08/18/2017

Best Management Practices

No BMP/COA Type

Description

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CONDITIONS OF APPROVAL:

COA Type

Description

	<p>Planning: The following conditions of approval (COA) will apply:</p> <p>COA 90a - Prior to first use of the multi-well pit, operator shall submit and receive approval of an E&P waste management plan per Rule 907.a.(3).</p> <p>COA 90b - Prior to first use of the multi-well pit, operator shall submit via Form 4 Sundry an Operating Plan which lists locations and wells that this multi-well pit will be used to support and facilitate completions; the Operating Plan shall be updated annually as needed.</p> <p>COA 90c - Per Rule 902.e, this multi-well pit is permitted for maximum of three (3) years use for storage, recycling, reuse, treatment, or disposal of E&P waste or fresh water, as applicable. The three year time clock will start from the date of first use after hydrostatic testing and be based on submittal of the Form 42 providing that date. The operator shall cease using the pit after three (3) years use and immediately begin pit closure in accordance with Rule 905.</p> <p>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 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 and c. Notice of Construction or Major Change); operator shall notify the COGCC 48 hours prior to start of pit construction, pit liner installation, start of hydrostatic test, start of first use of pit for operations, pipeline testing, onsite and offsite pipeline testing (any permanent buried or temporary surface lines used for hydraulic stimulation and/or flowback operations), and start of hydraulic stimulation operations at nearby well pad locations 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.</p> <p>COA 92 - Prior to placement of any temporary surface pipelines (poly or steel), operator will submit a Form 4 Sundry Notice indicating the proposed route of the temporary surface pipelines and any pump stations along the route.</p>
	<p>Location Construction: The following conditions of approval (COAs) will apply to construction of the multi-well pit location:</p> <p>COA 44 - The access road from the public road to the multi-well pit location will be maintained as to not allow sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.</p> <p>COA 76 - Strategically apply fugitive dust control measures to reduce fugitive dust and coating of vegetation and deposition in water sources.</p>

Earthen Pit Construction: The following conditions of approval (COAs) will apply for construction of the multi-well pit and ancillary facilities:

COA 66 - Operator has indicated that fluid transfer from the pit to nearby well locations will be done entirely through existing permanent pipelines, or possibly temporary surface pipelines. Operator will not be allowed to load or unload produced water to or from the pit using trucks. Vacuum trucks may be utilized for use in skimming operations and in the final draining process prior to pit closure, but not utilized in the normal operation of the pit.

COA 61 - Operator must submit an as-built drawing (plan view and cross-sections) of the multi-well pit and the oil and gas location (including all tanks and other pit operations equipment) within 60 calendar days of re-construction of the location, pit, and any operating equipment.

COA 22 - After installation of the uppermost liner and prior to operating the pit, the synthetic liner(s) integrity shall be tested to the operating capacity of the pit facility (not to exceed the 2-foot freeboard requirement). The operator shall monitor the pit for leaks for a period of 72 hours prior to either draining the pit or commencing operations. Operator shall notify the COGCC 48 hours prior to start of the hydrotest using the Form 42. Hydrotest monitoring results must be maintained by the operator for the life of the pit and provided to COGCC prior to using the pit via a Form 4 Sundry.

COA 59 - The multi-well pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed. The fencing shall be placed a minimum of 1-foot from the pit liner anchor trench.

COA 74 - Operator will use adequately sized secondary containment devices for all chemicals and/or hazardous materials stored or used on location.

COA 40 - Operator will implement measures to ensure that adequate separation of hydrocarbons from the influent occurs to prevent accumulation of oil on the surface of stored completions fluids. Operator shall also employ a method for monitoring buildup of phase-separated hydrocarbons on the surface of stored fluids.

COA 41 - Any oil (other than de minimis) observed on the surface of completions fluids must be removed in accordance with Rule 902.c.

Completions Operations: The following condition of approval (COA) will apply to the pit location during completion operations at nearby locations:

COA 26 - Potential odors associated with the mutli-well pit operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply to these Form 2A and Form 15 Permits if any temporary surface (COAs 45, 49, 54, and 55) or new buried permanent (COA 45) flowlines and/or offsite pipelines (poly or steel) are used during operations at the multi-well pit location as well as nearby well pad locations where completions are taking place:

COA 45 - Operator shall pressure test temporary surface or permanent buried pipelines (including flowlines from the existing tank battery to the multi-well pit [if constructed] and any temporary surface lines used for fluid transfer between this location and other oil and gas locations) in accordance with Rule 1101.e.(1) prior to putting any pipeline into initial service.

COA 49 - Operator must routinely inspect the entire length of all surface pipelines to ensure integrity. Operator shall conduct daily inspections of surface 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 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 surface pipelines at these crossings, operator will ensure appropriate containment by either 1) installing over-sized pipe "sleeves" which extend the length of the crossing and beyond to adequately sized catchment basins or appropriately designed divergent trenches to prevent a spill of fluids from reaching the stream or drainage; 2) 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 3) develop an alternative means for spill control and containment.

COA 55 - To reduce surface disturbance and minimize fragmentation of wildlife habitat, operator shall utilize, to the extent practical, existing public roads, private roads, and access roads, and/or existing pipeline right-of-ways, when placing/routing the temporary surface pipelines.

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2108186	CORRESPONDENCE
2108190	EARTHEN PIT PERMIT - SUPPLEMENTAL INFORMTION
401239324	PIT PERMIT SUBMITTED
401240356	SENSITIVE AREA DETERMINATION
401240357	OTHER
401240359	DESIGN: PLAN AND CROSS SECTION
401240360	OTHER
401240361	TOPOGRAPHIC MAP

Total Attach: 8 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	Initiated OGLA Form 2A and Form 15 review on 07-25-17/Completed OGLA Form 2A and Form 15 review on 08-16-17 by Dave Kubeczko; requested acknowledgement and concurrence of notification, double-lined pit, fencing and netting, as-builts, sediment and dust control access road/pad, odor control, secondary containment, pit hydrostatic test, truck loading/unloading, pit closure, 3-year max, pipeline testing, pipeline inspection, and temporary surface pipeline location Sundry COAs from operator on 08-03-17; received acknowledgement and concurrence of COAs from operator on 08-04-17; revised: Date planned to commence construction: from 08/01/2017 to 08/18/2017; corrected distances from Wellhead to Public Road from 5280' to 4680' and from Production Facility to Public Road from 5280' to 4515, based on COGCC's review of COGCC's Online GIS Map, 2015 Aerial Photo layer and Roads layer; based on proximity of the well pad to downgradient surface water (streams and/or intermittent streams located 318' to the north based on COGCC's review of COGCC's 2015 Aerial Photo Layer and Topo layer), COGCC has revised the distance to nearest downgradient surface water from 1480' to 318' and this location has been designated a "sensitive area"; passed by CPW on 07-17-17 with the operator submitted wildlife BMPs and recommendation to fence and net the pit being acceptable to minimize impacts to wildlife and to exclude all wildlife (i.e. small mammals, birds, etc.); attached revised Hydrology Map, Reference Area Map, Reference Area Pictures, Supplemental Pit Information; revise construction disturbance from 5.30 acres to 5.87 acres; revised size of location at interim reclamation from 5.30 to 4.12 acres;; passed OGLA Form 2A and Form 15 review on 08-17-17 by Dave Kubeczko; notification, double-lined pit, fencing and netting, as-builts, sediment and dust control access road/pad, odor control, secondary containment, pit hydrostatic test, no truck loading/unloading, pit closure, 3-year max, pipeline testing, pipeline inspection, and temporary surface pipeline location Sundry COAs.	08/04/2017
Environmental	This pad is located in an area designated as Sensitive Wildlife Habitat. Proper measures such as fencing and netting must be implemented to protect wildlife.	06/20/2017
Total: 2 comment(s)		