

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, September 12, 2017 9:51 AM
To: Dave Kubeczko - DNR
Subject: TEP Rocky Mountain LLC (Terra), PA 23-26 Tank Pad, NESW Sec 26 T6S R95W, Garfield County, Form 2A#401367749 Review

Importance: High

Categories: Operator Correspondence

Scan No. 2108220 CORRESPONDENCE 2A #401337749

Received verbal acknowledgement and concurrence from operator on 09-08-2017.

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, September 08, 2017 2:11 PM
To: Vicki Schoeber
Subject: TEP Rocky Mountain LLC (Terra), PA 23-26 Tank Pad, NESW Sec 26 T6S R95W, Garfield County, Form 2A#401367749 Review
Importance: High

Vicki,

I have been reviewing the TEP Rocky Mountain LLC (Terra) PA 23-26 Tank Pad **Form 2A #401367749**. Based on COGCC's review, the following revision has been made to the Form 2A:

Due on proximity of the tank pad to downgradient surface water (intermittent drainage located 220' to the east-southeast), proximity to a water well (55'), and potential for shallow groundwater (37' below ground surface), as well as COGCC's review of COGCC's 2015 Aerial Photo Layer, Topo Map layer, and Hydrology Map attachment), COGCC has revised the distance to nearest surface water feature from 3209' to 220' and designated this location a "sensitive area".

COGCC will attach the following conditions of approval (COAs) to the Form 2A based on the information and data Terra has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following COA 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 onsite pipeline testing (pipelines from the nearby well pad to onsite storage tanks) 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.

Construction: The following COAs will apply:

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at the tank site during production operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices [BMPs] associated with fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water.

COA 44 - The access road 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.

COA 76 - Strategically apply fugitive dust control measures to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel [or equivalent] with an impervious liner) to contain any spilled or released material around permanent condensate and produced water storage tanks.

COA 48 - Since condensate storage tanks are planned to be constructed on location, operator shall submit a scaled as-built drawing (plan view with distances) of this oil and gas location (showing onsite flowlines, offsite pipelines, and production facilities [storage tanks, etc.]) and the nearby well pad location from which the condensate and/or produced water will be sent from via underground pipelines (showing wellheads, onsite flowlines, offsite pipelines, and other production facilities [separators, blowdown tank, etc]) within 30 calendar days of construction of the production equipment on either or both locations.

Emissions Mitigation: The following COA will apply:

COA 26 - Potential odors associated with long term production operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following COAs will apply to this Form 2A Permit if any temporary surface (COAs 45, 49, 54, and 55) or buried permanent (COA 45) onsite pipelines and/or offsite pipelines (poly or steel) are used during operations at this storage tank location:

COA 45 - Operator shall pressure test pipelines (pipelines from offsite separators to tanks, and take away gas and produced water pipelines) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network, and tested annually, unless agreed to by both parties that the pipelines can be managed under an approved COGCC variance.

COA 49 - Operator must routinely inspect the entire length of the surface pipeline to ensure integrity. Operator shall conduct daily inspections of surface poly 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 poly or steel 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 these crossings: if poly pipe is used on the surface, operator will ensure appropriate containment by either installing over-sized pipe "sleeves" which extend the length of the crossing and beyond to a distance deemed adequate to capture (catchment basins) and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; 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 develop an alternative means for containment. For all other pipeline materials, operator will implement BMPs necessary to mitigate a potential for E&P fluids not to reach groundwater or flowing surface water.

COA 55 - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the temporary surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

Terra does not need to respond to this email unless you have questions or issues with any of these COGCC COAs, which are similar and/or identical to COAs placed on all well pad and production facility (tank battery) locations in Garfield County. The COGCC OGLA review task will be passed on 09-08-17, with the Form 2A being sent to final approval the following week. 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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09/09/16 - location onsite by COGCC, CPW, BLM, and operator;
08/23/17 - passed by CPW with operator submitted wildlife BMPs, BLM wildlife stipulations and COAs, and operator / BLM / CPW mitigation project (to be determined) being acceptable;
09/08/17 - Initiated / Completed OGLA Form 2A review by Dave Kubeczko;
09/08/17 - sent email to operator indicating that the following COAs will be placed on the Form 2A - notification, fluid containment and spill/release BMPs, tank berming, as-built, sediment and dust control access road, odor control, temporary pipeline placement/inspection/containment, and pipeline testing;
09/08/17 - due to proximity of the tank pad to downgradient surface water (intermittent drainage located 220' to the east-southeast), proximity to a water well (55'), and the potential for shallow groundwater (37' below ground surface), as well as COGCC's review of COGCC's 2015 Aerial Photo Layer, Topo Map layer, and Hydrology Map attachment), COGCC has revised the distance to nearest surface water feature from 3209' to 220' and designated this location a "sensitive area";
09/08/17 - passed OGLA Form 2A review by Dave Kubeczko with notification, fluid containment and spill/release BMPs, tank berming, as-built, sediment and dust control access road, odor control, temporary pipeline placement/inspection/containment, and pipeline testing COAs.