

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Monday, October 02, 2017 2:45 PM
To: Dave Kubeczko - DNR
Subject: Laramie Energy LLC, CC 0697-03-07 Pad, Lot 11 Sec 3 T6S R97W, Garfield County, Form 2A#401387622 Review
Attachments: CC 03-07 15 MULTI.pdf
Categories: Operator Correspondence

Scan No. 2108227 CORRESPONDENCE 2A #401387622

From: Joan Proulx [mailto:jproulx@laramie-energy.com]
Sent: Wednesday, September 27, 2017 1:13 PM
To: Dave Kubeczko - DNR
Subject: Laramie Energy CC 0697-03-07 Pad, 2A #401387622

Dave:

As you requested, attached is an updated Multi Well Plan showing all proposed wells for the CC 0697-03-07 pad.

Regards,

Joan Proulx
Regulatory Analyst
Laramie Energy, LLC
760 Horizon Drive, Suite 101
Grand Junction, CO 81506
970-263-3641
jproulx@laramie-energy.com



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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Monday, September 18, 2017 10:46 AM
To: Joan Proulx
Cc: Wayne Bankert

Subject: Laramie Energy LLC, CC 0697-03-07 Pad, Lot 11 Sec 3 T6S R97W, Garfield County, Form 2A#401387622

Review

Importance: High

Joan,

I have been reviewing the Laramie Energy LLC (Laramie), CC 0697-03-07 Pad **Form 2A# 401387622**. COGCC requests a revised 'Multi-Well Plan' attachment showing the trajectory of all 24 wells proposed at this well pad location. This location was onsite with the operator, CPW, and BLM on 08-02-17; while COGCC onsite this location on 08-31-17. Based on COGCC's review, the following revision has been made to the Form 2A:

Due to proximity of the well pad to downgradient surface water (intermittent drainage located 404' to the east-southeast as shown on the Hydrology Map attachment), COGCC has revised the distance to nearest surface water feature from 924' to 404'; in addition, due to the highly fractured nature of the surface material and near surface geologic material in the area (Uinta and Parachute Creek Formations) around the Roan Rim, COGCC has 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 Laramie 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 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 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.

Construction: The following conditions of approval (COAs) will apply:

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion 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 constructed and 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 with poly liner or equivalent) to contain any spilled or released material around permanent condensate and produced water storage tanks.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 11 - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. After drilling and completion operations have been completed, the drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must be sampled and meet the applicable standards of Table 910-1. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location. No offsite disposal of cuttings to another oil and gas location shall occur without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. No offsite reuse of cuttings to another oil and gas location shall occur without prior approval of a Beneficial Reuse or Land Application Plan (submitted via a Form 4 Sundry Notice) specifying reuse or application, location, and waste characterization method. Commercial disposal of drill cuttings and drilling

fluids will only require the operator to maintain documentation (manifests, bills of lading, etc) of drill cuttings and drilling fluids disposal.

COA 25 - Flowback and stimulation fluids must be sent to enclosed tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline storage vessel, or other open top containment located on the well pad; or into tanker trucks for offsite disposal. No open top tanks can be used for initial flowback fluids containment. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material. No additional downgradient berming is required if operator constructs a sufficiently sized perimeter berm.

Emissions Mitigation: The following COA will apply:

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply to the Form 2A:

COA 45 - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent surface/buried pipelines and following any reconfiguration of the pipeline network. All permanent flowlines from wellheads to separators and from the separators to the tank will also be pressure tested annually.

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 surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

Laramie does not need to respond to this email unless you have questions or issues with any of these COAs, which are similar and/or identical to COAs placed on all well pad locations in Mesa and Garfield Counties. In addition, could Laramie provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location (or when you receive them if the Federal APDs have not yet been approved). 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



Colorado Oil & Gas Conservation Commission
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08/02/17 - location was onsite by CPW, BLM, and operator;
08/31/17 - location was onsite by COGCC;

09/01/17 - passed by CPW - due to the existing development and fragmentation in this area along with the topography and habitat conditions at this site, greater sage-grouse use is unlikely - BLM lease stipulations and COAs are sufficient to address other wildlife and habitat concerns;

09/18/17 - Initiated / Completed OGLA Form 2A review by Dave Kubeczko;

09/18/17 - sent email to operator indicating that the following COAs will be placed on the Form 2A - notification, fluid containment and spill/release BMPs, sediment and dust control access road, cuttings containment and management, odor control, flowback to tanks only, and pipeline testing;

09/18/17 - due to proximity of the well pad to downgradient surface water (intermittent drainage located 404' to the east-southeast as shown on the Hydrology Map attachment), COGCC has revised the distance to nearest surface water feature from 924' to 404'; in addition, due to the highly fractured nature of the surface material and near surface geologic material in the area (Uinta and Parachute Creek Formations) around the Roan Rim, COGCC has designated this location a "sensitive area";

10/02/17 - passed OGLA Form 2A review by Dave Kubeczko with notification, fluid containment and spill/release BMPs, sediment and dust control access road, cuttings containment and management, odor control, flowback to tanks only, and pipeline testing COAs.