

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, March 31, 2011 11:11 AM
To: Kubeczko, Dave
Subject: FW: Noble Energy, Pad 8A - Spruce Creek 8-31D, NENE Sec 8 T7S R94W, Garfield County, Form 2A #400125302 Review

Categories: Orange Category

Scan No 2033673 CORRESPONDENCE 2A#400125302

From: TMcNutt@nobleenergyinc.com [mailto:TMcNutt@nobleenergyinc.com]
Sent: Thursday, March 31, 2011 11:04 AM
To: Kubeczko, Dave
Subject: Re: Noble Energy, Pad 8A - Spruce Creek 8-31D, NENE Sec 8 T7S R94W, Garfield County, Form 2A #400125302 Review

Dave,

Re: Pad 8A - Spruce Creek 8-31D, Form 2A:

We concur with the Conditions of Approval (COAs) below.

Thank you,

Tania McNutt
Regulatory Analyst II
Rockies – Piceance Basin
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From: "Kubeczko, Dave" <Dave.Kubeczko@state.co.us>
To: <TMcNutt@nobleenergyinc.com>
Date: 03/21/2011 03:47 PM
Subject: Noble Energy, Pad 8A - Spruce Creek 8-31D, NENE Sec 8 T7S R94W, Garfield County, Form 2A #400125302 Review

Tania,

I have been reviewing the Pad 8A - Spruce Creek 8-31D **Form 2A**(#400125302). COGCC would like to attach the following conditions of approval (COAs) based on the data Noble Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1740 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates two intermittent streams located approximately 257 feet to west-northwest and 338 feet to the east. I can make the change if you send an email with this request. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which operator has already indicated on the Form 2A) and requiring the following conditions of approval (COAs):

COA 4 - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary

containment for any volume of fluids contained at 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 stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed temporary surface pipelines or buried pipelines.

COA 7 - Either a lined drilling pit or a closed loop system (which operator has indicated on the Form 2A) must be implemented.

2. **General:** The following conditions of approval (COAs) will apply:

COA 38 - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.

COA 46 - The surface soils and materials are fine-grained and highly unconsolidated; therefore appropriate BMPs need to be in place during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

COA 26 - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to start of fracing operations.

COA 25 - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs (Items 1 and 2) to the Form 2A permit prior to passing the OGLA review. The other issue (item 1) also needs to address prior to permit approval. 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

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