

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, September 11, 2014 2:47 PM
To: Dave Kubeczko - DNR
Subject: FW: Elm Ridge Exploration Company LLC (Elm Ridge), IGS 146 Pad, NWSE Sec 21 T33N R8W, La Plata County, Form 2A#400647197

Categories: Operator Correspondence

Scan No 2107096 CORRESPONDENCE 2A#400647197

From: Terry Lindeman [mailto:TLindeman@elmridge.net]
Sent: Wednesday, August 27, 2014 4:26 PM
To: Dave Kubeczko - DNR
Subject: RE: Elm Ridge Exploration Company LLC (Elm Ridge), IGS 146 Pad, NWSE Sec 21 T33N R8W, La Plata County, Form 2A#400647197

Dave,
These are fine.
Thanks for the help.
Terry

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Monday, August 25, 2014 10:20 AM
To: Terry Lindeman
Cc: jl@animas.net
Subject: Elm Ridge Exploration Company LLC (Elm Ridge), IGS 146 Pad, NWSE Sec 21 T33N R8W, La Plata County, Form 2A#400647197

Terry,

I have been reviewing the Elm Ridge Exploration Company LLC (Elm Ridge) IGS 146 Pad **Form 2A #400647197**. COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the data Elm Ridge 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 - Notify the COGCC 48 hours prior to start of pad reconstruction/regrading (if necessary), rig mobilization, spud, pipeline testing, start of hydraulic stimulation operations, and start of flowback operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

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

COA 44 - The access road will be maintained as to not allow any 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, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 28 - The location is in an area of moderate run-on/run-off potential; therefore 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 run-off, especially toward the drainage located to the northeast of the well pad location.

COA 23 - Operator must ensure 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 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. Operator must ensure that any run-off protection along the northeast edge of the well pad be sufficient to protect the drainage adjacent to this location.

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

COA 38 - The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

COA 25 - If the well is to be hydraulically stimulated, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel located on the well pad; or into tanker trucks for offsite disposal. 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.

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated as to not impact nearby residences.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply to the Form 2A if any temporary/permanent surface or buried pipelines (poly or steel) are used during operations at the well pad location:

COA 45 - Operator shall pressure test 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.

Based on the CPW/COGCC Onsite on 08-06-14, CPW has proposed the following BMP for Elm Ridge to consider voluntarily placing on this Form 2A Permit:

“Suitable cliff nesting raptor habitat is located just south of the well location. Activity at raptor nest and the construction of a new nest can occur any time of year. However, the critical nesting period for raptors that would likely use the cliffs for nesting is from February 1 to July 31. CPW recommends avoiding construction and drilling operations during this time period. If construction activities must occur during this time period, CPW recommends a pre-construction raptor survey to determine if there are any active nests with 1/2 mile of the location. If a nest is found during the survey, notify CPW immediately and use CPW raptor buffer guidelines to avoid disturbing the nest.”

COGCC would appreciate your concurrence with attaching these COAs and the CPW BMP to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist
Western Colorado



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