

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, January 27, 2010 10:26 AM
To: Kubeczko, Dave
Subject: FW: Wexpro Sugar Loaf Government 17, SENE Sec 5 T11N R101W, Moffat County, Form 2A (#2093249) Review

Scan No 2032784 CORRESPONDENCE 2A#2093249

From: Dee Findlay [mailto:Dee.Findlay@questar.com]
Sent: Tuesday, January 26, 2010 11:19 AM
To: Kubeczko, Dave
Subject: RE: Wexpro Sugar Loaf Government 17, SENE Sec 5 T11N R101W, Moffat County, Form 2A (#2093249) Review

Dave:

Thank you for your assistance today in completing the Form 2A. I have responded to the questions in red below.

Dee Findlay

Wexpro Company

Permit Agent

307 922-5608

307 354-6346 (cell)

307 352-7575 (fax)

dee.findlay@questar.com

**** Please note that I am out of the office on the first and third Friday of each month****

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, January 19, 2010 3:05 PM
To: Dee Findlay
Subject: Wexpro Sugar Loaf Government 17, SENE Sec 5 T11N R101W, Moffat County, Form 2A (#2093249) Review

Dee,

I have been reviewing the Sugar Loaf Government 17 (#2093249) **Form 2A**. COGCC requests the following clarifications regarding the data Wexpro has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The dates for construction (04/16/2010) and interim reclamation (04/01/2011) appear to be too far apart. Since only 1 well is planned to be drilled and completed at this pad, 12 months seems like a long time between drilling/completion and the start of interim reclamation. COGCC guidelines require that interim reclamation begins 6 months after well drilling/completion on non crop land. Can you confirm the estimated drilling/completion schedule and these dates. I can make the change (if necessary) if you send an email with this request. . **The window for the disturbance will allow for the construction of the location will be completed approximately 1 to 3 months prior to the rig moving in, with drilling and completion taking approximately 2 -3 months. Reclamation will begin as soon as the free water is off the pit, either by transferring, mechanical evaporation, or solidification. It is understood that interim reclamation is required to begin 6 months after drilling/completion.**

2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 200 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):
 - COA 4** - Location is in a sensitive area because of close 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. **The Federal Surface Use Plan, attached to the Federal APD form, states that the holding capacity of the containment will be 110% of the tank volume.**
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids. **All BMP will be in place to contain any unintentional releases in accordance with the Wexpro Company**
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 1206 feet bgs for a well located 4.5 miles (23760 feet) from the proposed well. COGCC's review indicates there is a water well (Permit No. 17084-R-Mountain Fuel Supply Company, industrial well) to the northeast, with a total depth of 1206 feet bgs, a depth to groundwater of 708 feet bgs, and a pumping rate of 41 gpm. I believe this is the well you located. The number that comes up on our GIS map is 1206 feet (this number often pertains to the total depth of the well, not the depth to groundwater). I can make the change if you send me an email with this request. **Please make the necessary changes on the Form 2A.**
4. **Rule 303.d.(3).C.:** Neither the Location Drawing, Addendum to Legal Plat for Sugar Loaf Government #17 nor the scaled Construction Layout Drawing (Figure #1) show the location of the proposed gas pipeline. One of these drawings should show the anticipated location of the new facility. **The final pipeline route will be determined by Questar Gas Management and the will apply for the right-of-way under separate cover. The pipeline will probably be run to the north east to an existing Questar Gas Management pipeline.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

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

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