

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, February 08, 2010 2:57 PM
To: Kubeczko, Dave
Subject: FW: Black Hills Plateau Production, Homer Deep Unit 21-41, NENE Sec 21 T8S R98W, Mesa County, Form 2A (#400024938) Review
Attachments: HDU 21-41 Hydrology Map C.pdf

Scan No 2032823 CORRESPONDENCE 2A#400024938

From: Donahue, Jessica [mailto:Jessica.Donahue@blackhillscorp.com]
Sent: Thursday, February 04, 2010 11:16 AM
To: Kubeczko, Dave
Subject: RE: Black Hills Plateau Production, Homer Deep Unit 21-41, NENE Sec 21 T8S R98W, Mesa County, Form 2A (#400024938) Review

Dave,

Hopefully I addressed all your points of concern.

1. **Water Resources (Section 14):** Black Hills has no issues with those COAs since they're standard operating practices as is.
2. **Water Resources (Section 14):** That is the well I was referencing.
3. **Rule 303.d.(3).A:** This is a refile. The location is inaccessible during winter due to winter strips which end March 1. I had made the agreement with the initial reviewer that come spring I would go out and get the rest of the photographs since they also double as reference area photos.
4. **Rule 303.d.(3).C:** Gas and water pipelines will be co-located with the road.
5. **Rule 303.d.(3).D:** I've updated the hydrology map to show the updated nearest surface water being 228' away. I've attached it to this email.

Let me know if you need anything else.

Thanks,
Jessica

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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, February 02, 2010 3:11 PM
To: Donahue, Jessica
Subject: Black Hills Plateau Production, Homer Deep Unit 21-41, NENE Sec 21 T8S R98W, Mesa County, Form 2A (#400024938) Review

Jessica,

I have been reviewing the Homer Deep Unit 21-41 (#400024938) **Form 2A**. COGCC requests the following clarifications regarding the data Black Hills has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1950 feet. Based on COGCC's review, the nearest surface (this includes intermittent streams and drainages) is 228 feet to the southeast. 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.
COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 100 feet bgs for a well located 9134 feet from the well pad. COGCC's review did find one water well (Permit No. 9338-F-Bowen, irrigation well) located approximately 9100 feet to the north, with a total depth of 81 feet bgs, a depth to groundwater of 40 feet bgs, and a pumping rate of 600 gpm. I believe this is the well you located. I can make the change if you send an email with this request.
3. **Rule 303.d.(3).A:** A minimum of four color photographs; one (1) of the staked location from each cardinal direction. Each photograph shall be identified by: date taken, well or location name, and direction of view. There is one picture showing the staked location (northeasterly) and one showing the access road. There needs to be additional photographs in the other three cardinal directions.
4. **Rule 303.d.(3).C:** Neither the scaled Addendum to Legal Plat for Homer Deep Unit #21-41 (Sheet 2b of 11) nor the Location Drawing Cut Sheet for Homer Deep Unit 21-41 (Sheet 4 of 11), show the location of the proposed gas and water pipelines. One of these drawings should show the anticipated locations of these new and/or existing facilities. In addition, there needs to be a scaled drawing showing all visible improvements within 400 feet of the proposed disturbance for the pad.
5. **Rule 303.d.(3).D:** A topographic map showing all surface waters and riparian areas within one thousand (1,000) feet of the proposed oil and gas location, with a horizontal distance and approximate bearing from the oil and gas location is required. The attached hydrology map does not identify the nearest surface water (which does not necessarily have to be within the 1000 foot radius). An updated hydrology map would be appreciated.

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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