

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, February 16, 2010 9:02 AM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Johnson 05-06 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094424) Review
Attachments: LARAMIE ENERGY II Standard Wildlife BMP.pdf

Scan No 2032855

CORRESPONDENCE

2A#2094424

From: Wayne Bankert [mailto:wbankert@Laramie-Energy.com]
Sent: Monday, February 08, 2010 9:07 AM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Johnson 05-06 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094424) Review

Dave,
Here are my answers to your request below.

1. Water Resources- LEII standard practices
2. Please make the change.
3. COA 38- We comply with the COGCC rules for pit closures on non-crop lands (1003.d.2) which references the 900 series. COA 39- LEII cuttings trenches are excavated in cut.
4. Attached is LEII's Standard Wildlife BMP's for operations in the Piceance.

Wayne P. Bankert
Senior Regulatory & Environmental Coordinator
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Sunday, February 07, 2010 5:04 PM
To: Wayne Bankert
Subject: Laramie Energy II, Johnson 05-06 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094424) Review

Wayne,

I have been reviewing the Johnson 05-06 PAD (#2094424) **Form 2A**. COGCC requests the following clarifications regarding the data Laramie Energy II 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 that the distance to the nearest surface water is 600 feet. COGCC's review indicates that West Mamm Creek is approximately 478 feet to the west-northwest. 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 88 feet bgs for a well located 1131 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 174078-A-Johnson, domestic well) to the north-northeast, with a total depth of 108 feet bgs, a depth to groundwater of 34 feet bgs, and a pumping rate of 14 gpm. I believe this is the well you identified. If LEII has more current groundwater level data than that which is in the State's water well database, can you please confirm. Otherwise, I can make the change if you send me an email with this request.
3. **General:** Due to the potentially permeable nature of the surface materials in this area, 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 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.
5. **General:** Can Laramie Energy II resubmit the wildlife BMPs without any reference to CDOW's document that lists BMPs and can any reference to the potential that some wildlife BMPs may be objectionable to the surface owner or anything that may be contrary to any stipulations in LEII's surface use agreement with Johnson. As submitted, COGCC cannot enforce any of these BMPs if they are not acceptable to the surface owner.

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
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