

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, March 16, 2010 7:29 PM
To: Kubeczko, Dave
Subject: FW: Chevron USA Inc, Beezley 5X22 and 6X22, SWNE Sec 22 T2N R103W, Rio Blanco County, Form 2A (#2095539) Review

Scan No 2032951 CORRESPONDENCE 2A#2095539

From: Peterson, Diane L. (DLPE) [mailto:DLPE@chevron.com]
Sent: Tuesday, March 09, 2010 2:28 PM
To: Kubeczko, Dave
Subject: RE: Chevron USA Inc, Beezley 5X22 and 6X22, SWNE Sec 22 T2N R103W, Rio Blanco County, Form 2A (#2095539) Review

Dave.

I have addressed each of the issues below, please let me know if I need to send in a separate email.

I have a toe tapping engineer that asked me to find out if I need to wait until the Form 2a is approved before I submit the Form 2 APD's.

Diane L Peterson ■ ■ ☺

Regulatory Specialist Rangely & Wilson Creek, Colorado

Chevron North America Exploration and Production
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Email "dlpe@chevron.com"

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, March 04, 2010 6:26 PM
To: Peterson, Diane L. (DLPE)
Subject: Chevron USA Inc, Beezley 5X22 and 6X22, SWNE Sec 22 T2N R103W, Rio Blanco County, Form 2A (#2095539) Review

Diane,

I have been reviewing the Beezley 5X22 and 6X22 **Form 2A** (#2095539). COGCC requests the following clarifications regarding the data Chevron 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 and interim reclamation appear to be incorrect since the interim reclamation date (03/01/2010) is before the construction date (05/01/2010). Can you confirm what the drilling/completion schedule is. I can make the changes if you send an email with these requests. **Site construction 7/15/10 Interim 9/1/10**
2. **Construction (Section 6):** Form 2A does not indicate if H₂S is anticipated. In the comments section, it is stated that H₂S will not be anticipated during well location construction, it is possible during the drilling operation. I can make the indication (yes) on the Form 2A if you send an email with this request. This information is

necessary since an H₂S safety plan may be needed. **Yes, during drilling – H₂S plan will be submitted with APD (or I can send now if needed)**

3. **Construction (Section 6):** Form 2A does not indicate if salt (>15,000 ppm TDS Cl) or oil based muds will be used. I can mark the applicable box if you send an email with this information. **No - water based drilling fluids consisting primarily of fresh water, bentonite, lignite, caustic, lime, soda ash and polymers.**
4. **Construction (Section 6):** Form 2A indicates that mud disposal will be offsite; however, no method was selected. One of the methods (e.g., Land Farming, Land Spreading, Disposal Facility, or Other) needs to be selected. I can make the change if you send an email with this request. **Disposal Facility**
5. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 22970 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent, as well as, perennial streams. COGCC's review indicates there is an intermittent stream located approximately 487 feet to the south. I can make the change if you send me an email with this request. In addition, COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area**. The following conditions of approval (COAs) will apply:
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.
COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.
Please change nearest water to reflect dry wash 487 feet to the south and the COA 4 and 5 will be applied.
6. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (BLM Sheep Grazing Lease), four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (02/01/2010). **Plans have been made to have photographs taken during the growing season. (Snow just starting to melt)**

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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