

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, April 07, 2010 10:29 AM
To: Kubeczko, Dave
Subject: FW: Wexpro, B W Musser 31 Pad, NENE Sec 4 T11N R97W, Moffat County, Form 2A (#2095698) Review

Scan No 2033035 CORRESPONDENCE 2A#2095698

From: Dee Findlay [mailto:Dee.Findlay@questar.com]
Sent: Monday, April 05, 2010 10:56 AM
To: Kubeczko, Dave
Subject: RE: Wexpro, B W Musser 31 Pad, NENE Sec 4 T11N R97W, Moffat County, Form 2A (#2095698) Review

Response is in red

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, March 31, 2010 1:11 PM
To: Dee Findlay
Subject: Wexpro, B W Musser 31 Pad, NENE Sec 4 T11N R97W, Moffat County, Form 2A (#2095698) Review

Dee,

I have been reviewing the B W Musser 31 Pad **Form 2A** (#2095698). 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. Facilities (Section 5):** The construction layout drawings (Figure 1) indicate that there will be a separate flare pit located northeast of the reserve pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request. **Please make the necessary changes, the Form 15 is being completed at this time**
- 2. Construction (Section 6):** The dates for construction and interim reclamation appear to be incorrect since the construction date (02/03/2010) has already passed. Can you confirm what the drilling/completion schedule is. I can make the changes if you send an email with these requests. **Construction started in May 2009. Archeological features were discovered and the BLM halted construction until a Discovery and Monitoring Plan could be developed. At this time the Memorandum of Agreement is in the process of being signed by Questar and will be sent to the BLM for signature. Once this is complete construction can resume and be completed.**
- 3. Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 250 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.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids. **The above listed COS's are acceptable to Wexpro Company.**
- 4. Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 455 feet bgs for a well located 5604 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 16212-S-Mountain Fuel Supply Company, industrial well) located 5192 feet to the west-southwest, with a total depth of 775 feet bgs, a depth to groundwater of 103 feet bgs (based on well log), and a pumping rate of 18 gpm. I believe this well is indicative of groundwater conditions in the area. I can make the change if you send me an email with this request. **Please make the necessary chances as required.**

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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