

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, May 03, 2010 3:59 PM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Bruton 19-14 Pad, SESW Sec 19 T9S R93W, Mesa County, Form 2A (#2581443) Review

Scan No 2033096 CORRESPONDENCE 2A#2581443

From: Wayne Bankert [mailto:wbankert@laramie-energy.com]
Sent: Thursday, April 29, 2010 1:50 PM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Bruton 19-14 Pad, SESW Sec 19 T9S R93W, Mesa County, Form 2A (#2581443) Review

Dave,

LEII accepts the COA's outlined in No.s 1&2 below.

In regards to No. 3, the SUA agreement and corresponding Exhibit A has the following notation:

NOTE: GAS GATHERING
LINE & PRODUCED
WATERLINE TO FOLLOW
ALONG ACCESS ROAD

Thanks

Wayne P. Bankert
Senior Regulatory & Environmental Coordinator
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, April 29, 2010 12:31 PM
To: Wayne Bankert
Subject: Laramie Energy II, Bruton 19-14 Pad, SESW Sec 19 T9S R93W, Mesa County, Form 2A (#2581443) Review

Wayne,

I have been reviewing the Bruton 19-14 Pad **Form 2A** (#2581443). 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 (OGLA).

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 210 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.
2. **General:** Due to the potentially permeable nature of the surface materials in this area, the following conditions of approval (COAs) will apply:
- COA 9** - All pits must be lined.
- 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.
3. **Rule 303.d.(3).C.:** Neither the scaled construction layout drawing (Drawing 1 of 4) nor the location drawing show the location of the proposed gas and water pipelines. One of these drawings should show the anticipated locations of these new facilities. Otherwise, a statement indicating that the proposed pipeline locations will follow the access road in the comments section would be sufficient. I can make the change if you send an email with this request.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. 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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