

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, May 03, 2010 12:58 PM
To: Kubeczko, Dave
Subject: FW: Gunnison Energy Corp, Spadafora 1190, #20-21, NENW Sec 20 T11S R90W, Gunnison County, Form 2A (#400051597) Review
Attachments: SPADAFORA 1190 #20-21 - ACCESS RD PL DETAIL TOPO D.pdf

Scan No 2033089 CORRESPONDENCE 2A#400051597

From: Lee Fyock [mailto:Lee.Fyock@OXBOW.COM]
Sent: Thursday, April 29, 2010 1:59 PM
To: Kubeczko, Dave
Subject: RE: Gunnison Energy Corp, Spadafora 1190, #20-21, NENW Sec 20 T11S R90W, Gunnison County, Form 2A (#400051597) Review

Thanks Dave. My mistake on the flare pit. There will be no need for a flare since the pipeline will be constructed at the time of pad construction. Testing will be directly into the existing pipeline. I attached drawings showing the road and pipeline. There is a stock pond that receives storm water at 323 feet. It is fed by an ephemeral stream that only flows in the spring, we intend to provide 110% containment for all fluids associated with or used on site. If you need any additional information, please contact me. Thank you, Lee Fyock, Gunnison Energy Corporation

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, April 29, 2010 1:48 PM
To: Lee Fyock
Subject: Gunnison Energy Corp, Spadafora 1190, #20-21, NENW Sec 20 T11S R90W, Gunnison County, Form 2A (#400051597) Review

Lee,

I have been reviewing the Spadafora 1190, #20-21 **Form 2A** (#400051597). COGCC requests the following clarifications regarding the data Gunnison Energy Corp has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** Form 2A indicates there will be a flare at this location; however, neither the Construction Layout Drawings nor the Location Drawing indicate that there will be a separate flare pit. If a flare pit will be constructed, then the Form 2A needs to indicate this pit as a special purpose pit and a Form 15 (Earthen Pit Report/Permit) needs to be submitted. I can make the change if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 323 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.
3. **General:** The following condition of approval (COA) 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.
4. **Rule 303.d.(3).C.:** Neither the Location Drawing for Spadafora 1190, #20-21 nor the scaled Construction Layout for Spadafora 1190, #20-21 show the location of the proposed gas and water pipelines. One of these drawings

should show the anticipated locations of these facilities. In lieu of amending one of these drawings, if the pipelines follow the access road, a statement in the comments section would be acceptable.

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 prior to passing the OGLA review. 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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



 *Please consider the environment before printing this e-mail*