

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, June 08, 2010 8:07 AM
To: Kubeczko, Dave
Subject: FW: Petroleum Development, P7-22-36 Pad , Lot 3 Sec 36 T6S R97W, Garfield County, Form 2A (#400059464) Review

Scan No 2033185 CORRESPONDENCE 2A#400059464

From: Larry Robbins [mailto:lrobbins@petd.com]
Sent: Tuesday, June 01, 2010 1:55 PM
To: Kubeczko, Dave
Cc: Steve W. Trippett; Nathan Anderson; Jeff Salen
Subject: RE: Petroleum Development, P7-22-36 Pad , Lot 3 Sec 36 T6S R97W, Garfield County, Form 2A (#400059464) Review

Good Afternoon Dave,

This e-mail will serve to summarize our phone conversation on June 1, 2010 concerning the P7-22-36 Form 2A Conditions of Approval (COA).

PDC will not be constructing pits on the P7-22-36 pad during drilling/completion operations due to the use of closed loop drilling/completion tank systems.

PDC acknowledges and will abide by COA requirements #'s 1 and 3.

COGCC acknowledges the water well 70' from the P7-22-36 pad is a water monitoring well and withdraws COA #2 requirements.

Please contact me at (303) 860-5822 or e-mail (lrobbins@petd.com) if you require any additional information.

Sincerely,
Larry Robbins

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, May 31, 2010 12:20 PM
To: Larry Robbins
Subject: Petroleum Development, P7-22-36 Pad , Lot 3 Sec 36 T6S R97W, Garfield County, Form 2A (#400059464) Review

Larry,

I have been reviewing the P7-22-36 Pad **Form 2A** (#400059464). COGCC requests the following clarifications regarding the data Petroleum Development 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 285 feet. COGCC guidelines require designating all locations with close proximity to surface water 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 234 feet bgs for a well located 70 feet from the proposed facility. COGCC guidelines require designating all locations with close proximity of a domestic water well (1/8 mile or 660 feet) a **sensitive area**. The following conditions of approval (COA) will apply:

COA 7 - Location may be in a sensitive area because of proximity to a domestic water well; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location may be in a sensitive area because of proximity to a domestic water well; therefore production pits or frac pits (if constructed) must be lined.

3. **General:** Due to the potentially fractured nature of the surface geology in this area, the following conditions of approval (COAs) will also apply:

COA 6 - Reserve pit must be lined or closed loop system must be implemented during drilling.

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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit 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

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