

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, June 11, 2010 9:16 AM
To: Kubeczko, Dave
Subject: FW: Mesa Energy, BDU 13-8-199, SENE Sec 13 T1S R99W, Rio Blanco County, Form 2A (#400065088) Review
Attachments: Attachment information.

Scan No 2033201 CORRESPONDENCE 2A#400065088

From: bob@banko1.com [mailto:bob@banko1.com]
Sent: Tuesday, June 08, 2010 3:25 PM
To: Kubeczko, Dave
Cc: dave Cesark
Subject: Re: Mesa Energy, BDU 13-8-199, SENE Sec 13 T1S R99W, Rio Blanco County, Form 2A (#400065088) Review

Dave,

Per Dave Cesark of Mesa Energy Partners, LLC, in an email dated June 8, 2010, Mesa agrees to all requested Conditions of Approval stated by the COGCC below. I be sending the required Form 15 (Earthen Pit Report/Permit) to the COGCC to accompany the Form 2A.

1. **Facilities (Section 5):** Construction layout drawing (Sheet 1 of 3) indicates that there will be a separate flare pit located southwest of the mud pit. This flare pit needs to be marked 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.
1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 840 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages, abandoned gravel pits), as well as, perennial streams. COGCC's review indicates there is an intermittent stream (identified on the Hydrology Map) 300 feet to the northeast. I can make the change if you send me an email with this request. COGCC guidelines require designating all locations within close proximity to surface water 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.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 0 feet bgs for a well located 3744 feet from the well pad. COGCC's review did not find this one water well. There are numerous water wells in the area with the same problem. However, COGCC's review did find one water well (Permit No. 5711-AD-Gulf Oil Corporation/Standard Oil Company, other well) located approximately 30360 feet (5.75 miles) to the south-southwest; with a total depth of 1600 feet bgs, a depth to groundwater of 1200 feet bgs (based on top of perforated interval), and a pumping rate of 360 gpm. I believe this well is indicative of groundwater conditions in this area. I can make the change if you send an email with this request.
3. **General:** Due to the potentially fractured nature of the surface material in this area, the following conditions of approval (COAs) will also apply:

COA 6 - Reserve pit (or any other pit used to store fluids) must be lined or closed loop system must be implemented during drilling.

COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

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.

If you have any questions, please to not hesitate to contact me 303.820.4480 or email at bob@banko1.com.

Many thanks,

Christopher (Bob) Noonan

Regulatory Specialist

Banko Petroleum Management Inc.

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Christopher,

I have been reviewing the BDU 13-8-199 **Form 2A** (#400065088). COGCC requests the following clarifications regarding the data Mesa Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** Construction layout drawing (Sheet 1 of 3) indicates that there will be a separate flare pit located southwest of the mud pit. This flare pit needs to be marked 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.
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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 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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