

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, July 13, 2010 12:14 PM
To: Kubeczko, Dave
Subject: FW: Petroleum Development, P6-11-36 Pad , Lot 4 Sec 36 T6S R97W, Garfield County, Form 2A (#400069354) Review

Scan No 2033246 CORRESPONDENCE 2A#400069354

From: Larry Robbins [mailto:lrobbins@petd.com]
Sent: Wednesday, June 30, 2010 2:38 PM
To: Kubeczko, Dave
Cc: Steve W. Trippett; Nathan Anderson; Jeff Salen; Paul Whisenand
Subject: RE: Petroleum Development, P6-11-36 Pad , Lot 4 Sec 36 T6S R97W, Garfield County, Form 2A (#400069354) Review

Good Afternoon Dave,

PDC will not be constructing pits on the P6-11-36 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 4, 5, 6, 9, 23, 38, 39 and 40 as outlined below.

The water well you refer to in bullet point #2 below (Permit No. 271289-Puckett Land Company, monitoring well) is exactly what's indicated on the Form 2A. Please let me know if I'm missing something.

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

Sincerely,
Larry Robbins

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, June 28, 2010 1:23 PM
To: Larry Robbins
Subject: Petroleum Development, P6-11-36 Pad , Lot 4 Sec 36 T6S R97W, Garfield County, Form 2A (#400069354) Review

Larry,

I have been reviewing the P6-11-36 Pad **Form 2A** (#400069354). 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 the distance to the nearest surface is 420 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent streams (including ephemeral streams and drainages), as well as, perennial streams. 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 605 feet bgs for a well located 3150 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 271289-Puckett Land Company, monitoring well) located approximately 2236 feet to the east-southeast, with a total depth of 605 feet bgs and a depth to groundwater of 234 feet bgs. I believe this well is representative of groundwater conditions in this area. I can make the change if you send me an email with this request.
 3. **General Roan Rim:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County; therefore, this location will be designated a ***sensitive area***. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit (or any other pit used to store fluids) must be lined or closed loop system must be implemented during drilling.
 - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.
 - 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.
 4. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:
 - COA 6** - All pits must be lined.

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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