

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, July 14, 2010 10:36 AM
To: Kubeczko, Dave
Subject: FW: Robert L Bayless Producer, Weaver Ridge 13-9, NESE Sec 13 T1S R104W, Rio Blanco County, Form 2A #400064044 Review

Scan No 2033261 CORRESPONDENCE 2A#400064044

From: Habib Guerrero [mailto:hguerrero@rlbayless.com]
Sent: Wednesday, July 07, 2010 8:50 AM
To: Kubeczko, Dave
Cc: Yokley, Bill
Subject: RE: Robert L Bayless Producer, Weaver Ridge 13-9, NESE Sec 13 T1S R104W, Rio Blanco County, Form 2A #400064044 Review

Dave,

Thank you for your email. Robert L. Bayless intends to drill two new wells from the existing wellpad of the Weaver Ridge 13-9 location. The form 2 for these two wells (#400064021 and #400070038) have been submitted and designated as a related documents of form 2A (#400064044). All of the questions you have asked have been answered in the surface use plan , federal drilling plan and other files attached to the form 2 for each well. Please refer to the attachment section of these forms 2 and the comments section under item # 15 (form 2A) or #33 (form 2).

Regarding your questions:

1. Section 6:

- (0.0 acres) Bayless will remain within the original area of disturbance of the existing Wellpad of the Weaver Ridge 13-9. New access road construction or new surface disturbance are not required for this wellpad.
- (1.20 acres) is an estimated size or area after interim reclamation takes place.

2. Section 6:

- Please refer to the surface use plan attached to the related forms 2 mentioned above. Drilling pit will be lined as explained on surface plan items #7.A, 7.B and # 9. Also, the reason I marked Yes it is because Bayless will use a KCL polymer system (salt >15000 ppm) during drilling. No oil based mud will be used.

3. Section 14:

- As a note: these are dry washes (creeks) so I wasn't sure if this will qualify as a sensitive area but Please refer to the BMPs and surface use plan (item (9.E)) attached to the related forms 2 mentioned above. Drilling pit will be able to hold 600-700 bbls of fluid which is about 4 to 5 times the TD hole volume. .

4. Section 303.d.(3).H:

- Please refer to the attachment section of the related forms 2 mentioned above. You will find exhibits 5, 5A, and 5B under the attached federal drilling permit. These exhibits show the pit and pat layout , cut and fill Cross sections and Proposed facilities layout (this last one is an attachment of Form 2A)

Please let me know if this answer your questions,

Regards,

Habib



Robert L. Bayless Producer LLC
Habib Guerrero
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, July 06, 2010 4:44 PM
To: Habib Guerrero
Subject: Robery L Bayless Producer, Weaver Ridge 13-9, NESE Sec 13 T1S R104W, Rio Blanco County, Form 2A #400064044 Review

Habib,

I have been reviewing the Weaver Ridge 13-9 **Form 2A** (#400064044). COGCC requests the following clarifications regarding the data Robery L Bayless Producer has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Construction (Section 6):** The size of the disturbed area during construction (0.00 acres) and size of location after interim reclamation (1.20 acres) appear to be incorrect. Can you please confirm what these sizes are.
2. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used? has been marked **Yes**; therefore the following conditions of approval (COAs) will apply:
COA 11 - Either a lined drilling pit or closed loop system must be implemented.
COA 12 - Production pits must be lined.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 268 feet. 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.
4. **Rule 303.d.(3).H.:** Where the location disturbance is to occur on lands with a slope ten percent (10%) or greater, a construction layout drawing showing cut and fill areas, and a location cross-section plot showing cut and fill areas, as well as locations of any pits is required. The construction layout drawing should also show the locations of existing facilities and the anticipated locations of new facilities.

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) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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