

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, August 11, 2010 12:00 PM
To: Kubeczko, Dave
Subject: Samson Resources Company, Silver 33-5-1, NWSE Sec 5 T6N R91W, Moffat County, Form 2A #2557567 Review

Scan No 2033292 CORRESPONDENCE 2A#2557567

From: Grant Melvin [mailto:GMELVIN@samson.com]
Sent: Wednesday, July 28, 2010 4:00 PM
To: Kubeczko, Dave
Cc: Laura Abrams
Subject: Samson Resources Company, Silver 33-5-1, NWSE Sec 5 T6N R91W, Moffat County, Form 2A #2557567 Review

Dave,

I have reviewed your comments and the proposed COA's for item 2, 4, 5, and 7. Samson Resources agrees to the proposed conditions of approval for the above mentioned items.

Please let me know if you need more information.

Grant D. Melvin
District Surface Landman
Samson Resources
303 222 0951

From: Kubeczko, Dave
Sent: Wednesday, July 07, 2010 1:52 PM
To: gmittchell@samson.com
Subject: Samson Resources Company, Silver 33-5-1, NWSE Sec 5 T6N R91W, Moffat County, Form 2A #2557567 Review

Georganne,

I have been reviewing the Silver 33-5-1 **Form 2A** (#2557567). Since a Form 2 for this well location was submitted previously (10-16-2008) and approved (04-09-2009), this is not considered a New Location on the Form 2A, but rather an Amend Existing Location (Location #414011). I have made this change. COGCC requests the following clarifications regarding the data Samson Resources has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** The location layout drawing indicates there will be a separate flare pit located northeast of the cuttings 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.
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. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map #22 – Bulkey Silty Loam, 2 to 12 percent slopes. In the future, COGCC would appreciate the more detailed “Map Unit Description” report be attached to the Form 2A permit (COGCC has attached this report).
4. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1320 feet. COGCC’s rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC’s review of the USGS topographic map indicates there is an intermittent stream located approximately 446 feet to east-southeast. This distance and approximate bearing should be shown on the Hydrology Map. COGCC guidelines also require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) 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.
5. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 1320 feet bgs for a well located 1320 feet from the proposed well pad. COGCC’s review did not find a well located at this distance, however, COGCC did locate a water well (Permit No. 113417-Alicea, domestic well) located 2653 feet to the southeast, with a total depth of 182 feet bgs, a depth to groundwater of 32 feet bgs, and a pumping rate of 6 gpm. I believe this well is indicative of groundwater conditions in the area. I can make the change if you send me an email with this request.
6. **Rule 303.d.(3).A.:** There were no Location Pictures with the attachments. A minimum of four (4) color photographs; one (1) of the staked location from each of cardinal direction. Each photograph shall be identified by: date taken, well or location name, and direction of view. Can you please submit these photographs to me and I can attach them to the permit.
7. **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.
 - 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.

COGCC would appreciate your concurrence with attaching this COA 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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