

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Thursday, August 12, 2010 11:38 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Petroleum Development, P6-22-1 Pad , SENW Sec 1 T7S R97W, Garfield County, Form 2A (#400059919) Review

Scan No 2033304      CORRESPONDENCE      2A#400059919

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**From:** Larry Robbins [mailto:lrobbins@petd.com]  
**Sent:** Monday, August 02, 2010 10:52 AM  
**To:** Kubeczko, Dave  
**Cc:** Steve W. Trippett; Nathan Anderson; Jeff Salen; Paul Whisenand  
**Subject:** RE: Petroleum Development, P6-22-1 Pad , SENW Sec 1 T7S R97W, Garfield County, Form 2A (#400059919) Review

Good Morning Dave,

PDC will not be constructing pits on the P6-22-1 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.

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

Sincerely,  
Larry Robbins

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, August 02, 2010 6:55 AM  
**To:** Larry Robbins  
**Subject:** Petroleum Development, P6-22-1 Pad , SENW Sec 1 T7S R97W, Garfield County, Form 2A (#400059919) Review

Larry,

I have been reviewing the P6-22-1 Pad **Form 2A** (#400059919). 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 35 feet. Since the existing pad and access road have been constructed directly on top of the intermittent stream, and the easternmost edge of the well pad is approximately 700 feet upstream of an unidentified spring, COGCC guidelines require designating all locations with close proximity to surface water (which should reflect intermittent streams [including ephemeral streams, ditches, and drainages], as well as, perennial streams) 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. **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 contain/hold fluids) must be lined or a closed loop system (as previously indicated on the Form 2A Permit application by PDC in Section 6. Construction: and Section 15. Comments:) 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  $\frac{3}{4}$  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. 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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