

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, August 24, 2010 4:38 PM
To: Kubeczko, Dave
Subject: FW: Mesa Energy, BDU 25-1-199, NENE Sec 25 T1S R99W, Rio Blanco County, Form 2A (#400078954) Review
Attachments: Attachment information.

Scan No 2033316 CORRESPONDENCE 2A#400078954

From: bob@banko1.com [mailto:bob@banko1.com]
Sent: Friday, August 20, 2010 11:21 AM
To: Kubeczko, Dave
Cc: dave Cesark
Subject: Re: Mesa Energy, BDU 25-1-199, NENE Sec 25 T1S R99W, Rio Blanco County, Form 2A (#400078954) Review

Dave,

Thanks for the emails. Mesa agrees to all understated COAs. Regarding both the 14-9 and 25-1, Mesa will not be utilizing the flare pit, and will instead use a flare stack.

Please continue with the filing and let me know if there are any questions I can answer.

Many thanks,

Christopher (Bob) Noonan
Regulatory Specialist
Banko Petroleum Management Inc.
385 Inverness Parkway | Suite 420 | Englewood | Colorado | 80112
Office: 303.820.4480 | Fax: 303.820.4124 | Mobile: 513.503.3820
Email: bob@banko1.com | Website: www.banko1.com

Christopher,

I have been reviewing the BDU 25-1-199 Form 2A (#400078954). 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) review.

1. **Facilities (Section 5):** Construction layout drawing (Sheet 1 of 3) indicates that there will be a separate flare pit located north 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.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 290 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 (intermittent stream to the south); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures sufficiently protective of nearby surface water.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

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.

COGCC would appreciate your concurrence with attaching these COAs (items 2 and 3) to the Form 2A permit prior to passing the OGLA review. The other issue (item 1) also needs 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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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