

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Thursday, September 02, 2010 10:10 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: SG Interests I, McIntyre Flowback Pit 2, NESW Sec 23 T11S R90W, Gunnison County, Form 2A (#2583168) Review and Additional COA revisions

Scan No 2033339      CORRESPONDENCE      2A#2583168

**SG Interests (Eric Sanford) verbally concurred with the COAs on August 16, 2010.**

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, August 18, 2010 4:45 PM  
**To:** D McCallum; Eric Sanford  
**Cc:** Magee, Brian  
**Subject:** FW: SG Interests I, McIntyre Flowback Pit 2, NESW Sec 23 T11S R90W, Gunnison County, Form 2A (#2583168) Review and Additional COA revisions

Diane,

Based on a conversation with Eric on August 16, 2010, the following change to COA 48 has been made:

**COA 48** - Operator must implement best management practices to contain any unintentional release of fluids at the pit location, as well as along all portions of the surface poly pipeline route **where temporary or permanent pumps and other necessary equipment are located.**

In addition, the following change to COA 47 was also made based on discussions with SG Interests during the onsite on August 10, 2010:

**COA 47** - The flowback fluids pit must be **double-lined. The pit will also require a leak detection system (Rule 904.e).**

COGCC would appreciate your concurrence with making these changes to COA 48 and COA 47. COGCC understands that SG Interests would like to begin construction of these pits soon. COGCC will process this permit when we receive your concurrence with the proposed COAs, as well as clarifications to the other issues **(items 2 and 3 below)**. 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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[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)



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**From:** Kubeczko, Dave  
**Sent:** Monday, August 16, 2010 1:14 PM  
**To:** D McCallum; Eric Sanford  
**Cc:** Magee, Brian  
**Subject:** FW: SG Interests I, McIntyre Flowback Pit 2, NESW Sec 23 T11S R90W, Gunnison County, Form 2A (#2583168) Review and Additional COA

Diane,

Based on the CDOW/COGCC/SG Interests I onsite of August 10, 2010. COGCC feels that the following condition of approval (COA) would be appropriate for this location:

5. **Rule 904.a.(3) and (5):** Based on the fluids to be stored and transported through the surface poly pipeline, as well as the distance, topography, and features (streams [both perennial and intermittent], ditches, drainages) present along the route, the following COA will apply:

**COA 55** - Operator will utilize, to the extent practical, all existing access, forest service, other public roads, and/or existing pipeline right-of-ways, when placing/routing the surface poly pipeline. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

COGCC would appreciate your concurrence with attaching this additional COA (Item 5), as well as the previously submitted COAs that were discussed (item 4 below) in the attached email sent to SG Interests on July 30, 2010, to the Form 2A permit prior to passing the OGLA review. The other issues (items 2 and 3 below) also need to be addressed 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

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**From:** dmccallum@sginterests.com [mailto:dmccallum@sginterests.com]  
**Sent:** Saturday, July 31, 2010 7:29 PM  
**To:** Kubeczko, Dave  
**Subject:** Re: SG Interests I, McIntyre Flowback Pit 2, NESW Sec 23 T11S R90W, Gunnison County, Form 2A (#2583168) Review

Hi Dave,  
The area in question for the pits is most certainly dry rangeland. Poor cows have a tough go of things! My bad, around my neighborhood we call the sage country dryland.  
Please make the correction.  
Thank you,  
Diane

Sent via BlackBerry by AT&T

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**From:** "Kubeczko, Dave" <Dave.Kubeczko@state.co.us>  
**Date:** Fri, 30 Jul 2010 16:13:22 -0600  
**To:** D McCallum<dmccallum@sginterests.com>  
**Subject:** SG Interests I, McIntyre Flowback Pit 2, NESW Sec 23 T11S R90W, Gunnison County, Form 2A (#2583168) Review

Diane,

I have been reviewing the McIntyre Flowback Pit 2 **Form 2A** (#2583168). COGCC requests the following clarifications regarding the data SG Interests I has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Current Land Use (Section 10) and Future Land Use (Section 11):** Form 2A indicates that the current and future land use is marked as both Dry Land (Crop Land) and Rangeland (Non-Crop Land). Based on a review of the 2009 aerial photograph, as well as the location pictures provided, COGCC believes that this location is primarily Rangeland (there does not appear to be any evidence of prior dry land farming in this area). There are also more issues associated with the separation of topsoil layers in crop land areas, as opposed to non-crop land areas. If you concur, I can make this change if you send me an email with this request.
2. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are Non-Crop Land (Rangeland), a reference area needs to be indicated either on a topographic map or in the comments section if the reference area is adjacent to the proposed pad. In addition, four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (07/19/2010) unless the reference area is adjacent to the proposed pit and vegetation can be seen on the location pictures. SG Interests I needs to provide COGCC with a statement indicating in which direction from the proposed pit the reference area is located. I can make the change if you send an email with this request.
3. **Rule 303.d.(3).C.:** The Location Drawing (Location Map) does not show the 400-foot radius from the edge of disturbance showing all visible improvements. This drawing should show any improvements, particularly any proposed locations of surface pipelines (as indicated on the Access Road Map attachment). It would also be useful to know the route of the proposed surface poly pipeline to the two wells (i.e., will the pipeline following all existing roads; will it be laid out across undisturbed areas; how many streams, ditches, drainages will it cross?, etc).
4. **Rule 904.a.(3) and (5):** Form 2A indicates that this location will be used as a seasonal flowback storage pit (the pit will be utilized to store and recycle frac flowback fluids between frac jobs for wells 05-051-06086 [Federal 11-

89-17 #1, SWNE Sec 17 T11S R89W; located approximately 2.85 miles to the east-northeast] and 05-051-05059 [Federal 11-90-35 #1, SWNE Sec 35 T11S R90W; located approximately 1.90 miles to the south-southwest]). Based on the fluids to be stored and transported through the surface poly pipeline, as well as the distance, topography, and features (streams [both perennial and intermittent], ditches, drainages) present along the route, the following conditions of approval (COAs) will apply:

**COA 47** - The flowback fluids pit must be lined.

**COA 48** - Operator must implement best management practices to contain any unintentional release of fluids at the pit location, as well as along all portions of the surface poly pipeline route.

**COA 49** - Operator must routinely inspect the entire length of the surface poly pipeline to ensure integrity.

**COA 54** - Operator must ensure 110 percent secondary containment for any potential volume of fluids that may be released from the surface poly pipeline at all stream, intermittent stream, ditch, and drainage crossings.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 2, and 3) also need to be addressed 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**  
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