

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, September 02, 2010 9:38 AM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Honea 19-05 Pad, Lot 2 Sec 19 T7S R93W, Garfield County, Form 2A (#400083537) Review

Scan No 2033336 CORRESPONDENCE 2A#400083537

From: Wayne Bankert [mailto:wbankert@laramie-energy.com]
Sent: Thursday, August 19, 2010 3:28 PM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Honea 19-05 Pad, Lot 2 Sec 19 T7S R93W, Garfield County, Form 2A (#400083537) Review

Dave

We concur with the COGCC additional requirements for Numbers 1 & 3.

In regards to water resources (2). The public water supply system as indicated is solely the City of Rifle's Beaver Creek Municipal Watershed in which we have an approved watershed permit (City of Rifle Watershed Permit No. 04-08) as identified in the comments section of the Form 2a. Since Rifle is the only entity impacted and we have a watershed permit with them for multiple wells on this location, LEII feels it is unnecessary to notice other municipalities. In addition, Beaver Creek to the Colorado River is significantly less than 15 stream miles. Once it reaches the river it does not impact any other municipality.

Laramie II requests this requirement be waived since the sole municipality is well of aware of our operations within their watershed.

Wayne P. Bankert
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, August 19, 2010 3:10 PM
To: Wayne Bankert
Subject: Laramie Energy II, Honea 19-05 Pad, Lot 2 Sec 19 T7S R93W, Garfield County, Form 2A (#400083537) Review

Wayne,

I have been reviewing the Honea 19-05 Pad **Form 2A** (#400083537). COGCC requests the following clarifications regarding the data Laramie Energy II has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 15 feet bgs for a well located 6500 feet from the proposed well pad. COGCC's review indicates there are wells in this area with similar depths to groundwater. COGCC's guidelines require designating all locations with shallow groundwater a **sensitive area**. The following condition of approval (COA) will apply:
COA 1 - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system (which Laramie has indicated on the Form 2A) must be implemented.
2. **Water Resources (Section 14):** Form 2A indicates that all public water supply systems within 15 miles have been notified. **Rule 303.d.(3).N.** requires documentation that the applicant has provided notification of the application submittal to potentially impacted water systems within fifteen (15) stream miles downstream. Can you please provide copies of these notices.
3. **General 317B:** The following conditions of approval (COAs) will also apply:
COA 6 – Any pit constructed to hold fluids must be lined.
COA 23 - 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. 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.

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

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