

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, September 08, 2010 4:38 PM
To: Kubeczko, Dave
Subject: FW: Foundaion Energy Management, Roundup 22-24D, SENW Sec 24 T7NS R93W, Moffa...

Scan No 2033354 CORRESPONDENCE 2A#400085364

From: VLLPermitco@aol.com [mailto:VLLPermitco@aol.com]
Sent: Monday, August 30, 2010 1:34 PM
To: Kubeczko, Dave
Subject: Re: Foundaion Energy Management, Roundup 22-24D, SENW Sec 24 T7NS R93W, Moffa...

Foundation is agreeable to everything below. I will get you a Form 15 ASAP.

Venessa Langmacher

*Permitco Inc.
P.O. Box 99
Eastlake, CO 80614
303/857-9999 ext. 11
303/450-9200 fax*

In a message dated 8/30/2010 1:26:49 P.M. Mountain Daylight Time, Dave.Kubeczko@state.co.us writes:

Vanessa,

I have been reviewing the Roundup 22-24D **Form 2A** (#400085364). COGCC requests the following clarifications regarding the data Foundaion Energy Management has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Facilities (Section 5):** Form 2A indicates there will be a flare at this location. Construction layout drawings (Figure #1) indicate that there will be a separate flare pit located northeast of the reserve 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 depth to groundwater to be 12 feet bgs for a well located 4608 feet away from the proposed well pad. COGCC's review located a water well (Permit No. 133006—Walker, domestic well) located 4801 feet to the southeast, with a total depth of 200 feet bgs, a depth to groundwater of 80 feet bgs, and a pumping rate of 12 gpm. This is the well you indicated in the comments section. I can make the change if you send an email with this request.
3. **General:** Due to the potentially permeable nature of the surface material in this area, the following conditions of approval (COAs) will apply:

COA 9 - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.

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.

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 (item 3) to the Form 2A permit prior to passing the OGLA review. The other issues (items 2 and 3) need to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG

Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission

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