

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 26, 2010 8:22 AM
To: Kubeczko, Dave
Subject: FW: Black Hills Plateau Production, Federal 35-2, SWSW Sec 35 T9S R97W, Mesa County, Form 2A (#400100493) Review
Attachments: SAM_0035.JPG

Scan No 2033482 CORRESPONDENCE 2A#400100493

From: Donahue, Jessica [mailto:Jessica.Donahue@blackhillscorp.com]
Sent: Thursday, October 21, 2010 2:41 PM
To: Kubeczko, Dave
Subject: RE: Black Hills Plateau Production, Federal 35-2, SWSW Sec 35 T9S R97W, Mesa County, Form 2A (#400100493) Review

Dave,

I appreciate the proximity of the surface water concerns, but the way the well pad is currently constructed, I don't believe there is a lot of concern of water flowing in the direction of the surface water as it is located on the COGCC map. There is an approximately 5 foot step up to where the surface water is. I've attached a picture recently taken of the location (all the junk is the landowner's stuff that he is storing there). Our pit would go where the dump truck is so you can see there is a definite hill. The dump truck is situated facing north; the COGCC map shows the surface water to be to the east. Another factor would be that currently there is no water running in that drainage. It is an ephemeral stream; I think the only time it actually has water is during spring run-off.

Also, since the pit will be lined, can we then flowback to the pit? The flowback water would first go to the tanks to allow the sand to settle out before the tank would be dumped into the pit.

Thanks,
Jessica

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, October 21, 2010 11:48 AM
To: Donahue, Jessica
Subject: Black Hills Plateau Production, Federal 35-2, SWSW Sec 35 T9S R97W, Mesa County, Form 2A (#400100493) Review

Jessica,

I have been reviewing the Federal 35-2 **Form 2A** (#400100493). COGCC would like to attach the following conditions of approval (COAs) based on the data Black hills 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 distance to the nearest surface water is 495 feet. COGCC guidelines also require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) 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; 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 (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

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

COA 9 - If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

2. **General:** Due to the potentially permeable nature of the surface materials in the area (eolian deposits), the following conditions of approval (COAs) will apply:

COA 6 - A closed loop system must be implemented during drilling. Any other pit constructed that will hold any drilling or completion fluids must be lined.

COA 25 - Flowback to tanks only. Flowback and stimulation fluids shall be contained within tanks that are placed on the well pad in an area with adequate downgradient perimeter berming.

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 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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