

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, November 23, 2010 5:29 PM
To: Kubeczko, Dave
Subject: FW: KGH Operating Company, Meagher 10-1H, SENE (Lot 3) Sec 10 T1S R104W, Rio Blanco County, Form 2A (#2584353) Review
Attachments: Form2A (revised5).pdf

Scan No 2033510 CORRESPONDENCE 2A#2584353

From: Lorne Prescott [mailto:lprescott@oaconsulting.com]
Sent: Tuesday, November 16, 2010 5:32 AM
To: Kubeczko, Dave
Cc: tkproduction
Subject: RE: KGH Operating Company, Meagher 10-1H, SENE (Lot 3) Sec 10 T1S R104W, Rio Blanco County, Form 2A (#2584353) Review

Dave,

I have been tasked with providing you responses to your comments below, sorry about the delay, I was waiting on some additional information regarding the proposed location.

My responses are in Green below.

I have been reviewing the Meagher 10-1H **Form 2A** (#2584353). COGCC requests the following clarifications regarding the data KGH Operating has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, COGCC would like to attach the following condition of approval (COA) based on the information on the Form 2A prior to passing this Form 2A.

- 1. Construction (Section 6):** The date for construction (07/01/2010) appears to be incorrect since the construction date has already passed. Can you confirm the estimated construction schedule and date. I can make the change if you send an email with this request.
Please change the planned construction date to December 15, 2011
- 2. Facilities (Section 5):** Form 2A indicates there will be a flare pit at this location. If a separate flare pit will be constructed, this flare pit needs to be marked as a special purpose pit on the Form 2A 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.
There will not be a flare pit. The attached form reflects this. Please make the change in your files.
- 3. Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2650 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review of the USGS map and 2009 aerial photograph indicates there is an intermittent drainage located approximately 1177 feet to the southeast. I can make the change if you send an email with this request.
The attached form has been updated to reflect your comment above. Please make the change in your files.
- 4. General:** The following condition of approval (COA) will apply:
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.

We concur with attaching this COA (item 4) to the Form 2A permit prior to passing the OGLA review.

Please let me know if this response suffices,

Lorne

Lorne C. Prescott | Olsson Associates
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From: tkproduction [mailto:tkproduc@180com.net]
Sent: Thursday, November 04, 2010 9:33 AM
To: Lorne Prescott
Subject: Fw: KGH Operating Company, Meagher 10-1H, SENE (Lot 3) Sec 10 T1S R104W, Rio Blanco County, Form 2A (#2584353) Review

Lorne:

Forwarding this to you for your further handling.

Thanks - Jane

----- Original Message -----

From: [Kubeczko, Dave](mailto:kubeczko,dave)
To: tkproduc@180com.net
Sent: Thursday, November 04, 2010 8:41 AM
Subject: KGH Operating Company, Meagher 10-1H, SENE (Lot 3) Sec 10 T1S R104W, Rio Blanco County, Form 2A (#2584353) Review

Thomas,

I have been reviewing the Meagher 10-1H **Form 2A** (#2584353). COGCC requests the following clarifications regarding the data KGH Operating has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, COGCC would like to attach the following condition of approval (COA) based on the information on the Form 2A prior to passing this Form 2A.

1. **Construction (Section 6):** The date for construction (07/01/2010) appears to be incorrect since the construction date has already passed. Can you confirm the estimated construction schedule and date. I can make the change if you send an email with this request.
2. **Facilities (Section 5):** Form 2A indicates there will be a flare pit at this location. If a separate flare pit will be constructed, this flare pit needs to be marked as a special purpose pit on the Form 2A 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.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2650 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review of the USGS map and 2009 aerial photograph indicates there is an intermittent drainage located approximately 1177 feet to the southeast. I can make the change if you send an email with this request.
4. **General:** The following condition of approval (COA) will apply:
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 this COA (item 4) 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 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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