

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, January 20, 2011 1:47 PM
To: Kubeczko, Dave
Subject: FW: BOPCO LP, Yellow Creek Federal 3-34-0364, SWNE Sec 3 T1S R98W, Rio Blanco County, Form 2A (#400122636) Review
Attachments: YCF 3-34-0364 - Location Drawing - 11-15-10.pdf; YCF 3-34-0364 - Reference Photos - 01-04-11.pdf

Scan No 2033591 CORRESPONDENCE 2A#400122636

From: Haddock, Reed [mailto:RHaddock@BassPet.Com]
Sent: Thursday, January 20, 2011 8:55 AM
To: Kubeczko, Dave
Subject: RE: BOPCO LP, Yellow Creek Federal 3-34-0364, SWNE Sec 3 T1S R98W, Rio Blanco County, Form 2A (#400122636) Review

Dave:

Item: 1. BOPCO plans to use a closed loop system. I made a mistake by indicating mud disposal "onsite". Mud disposal is "offsite". We are not constructing a disposal facility on site.

Item: 2. You have my permission to make the change in APD concerning "closest intermittent stream" footage.

Item: 3. You have my permission to make the change in APD concerning "depth to groundwater".

Item: 4 . You have my permission to attach the listed COA's (9, 23, 25, 58, and 38).

Item: 5. Attached find the "Location Drawing Sheet". My surveyor Brock Slaugh did confer with Penny Garrison and verified that he did survey out 400' from the boundary of the proposed pad. Sheet 2b does show all visible improvements. See "Notes: 2. There are no other Natural Features or Existing Improvements Within 400' of the Well Pad".

Item: 6. The reference photos are attached and they show the four directions and they were taken during the growing season.

Reed

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, January 20, 2011 7:55 AM
To: Haddock, Reed
Subject: BOPCO LP, Yellow Creek Federal 3-34-0364, SWNE Sec 3 T1S R98W, Rio Blanco County, Form 2A (#400122636) Review

Reed,

I have been reviewing the Yellow Creek Federal 3-34-0364 **Form 2A** (#400122636). COGCC requests the following clarifications regarding the data BOPCO 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 conditions of approval (COAs) based on the information and data on or attached to the Form 2A prior to passing the permit.

1. **Construction (Section 6):** Form 2A indicates that mud disposal will be onsite at a disposal facility. Does BOPCO plan on constructing a disposal facility onsite or will the mud be disposed of at a facility offsite. I can make the change (to offsite and disposal facility or to onsite and land spreading or land farming) on the Form 2A if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 4716 feet. COGCC's review indicates there are several intermittent drainages/streams and ponds in the area, with the closest intermittent stream located approximately 279 feet to the northeast. I can make the change if you send an email with this request.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 280 feet bgs for a well located 10348 feet away from the proposed well pad. COGCC's review located a water well (Permit No. 11528-F-White River Nahcolite Minerals LTD, municipal well) located 10402 feet to the south-southeast, with a total depth of 1280 feet bgs, a depth to groundwater of 120 feet bgs (well documentation), and a pumping rate of 5 cfs. I can make the change if you send an email with this request.
4. **General:** Due to the highly fractured nature of the surface material in the area, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit must be lined or a closed loop system must be implemented (which operator has already indicated on the Form 2A).
 - 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 (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).
 - COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.
 - 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.
5. **Rule 303.d.(3).C.:** The Location Drawing (Sheet 2b of 11) does not show the 400-foot radius from the edge of disturbance showing all visible improvements. This drawing (or Sheet 11 which shows the proposed pipeline right-of-way as indicated in the **SURFACE USE PLAN** attachment) should show any improvements, particularly the proposed location of the gas and water pipelines. Otherwise, a statement indicating that the proposed pipeline locations will follow the access road in the comments section would be sufficient. I can make the change if you send an email with this request.
6. **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 (01/17/2011) unless the reference area is adjacent to the proposed pad and vegetation can be seen on the location pictures. If you can confirm that the reference area is adjacent to the pad and in what direction, I can make the change if you send an email with this request; otherwise, a reference area map and new photos are needed.

COGCC would appreciate your concurrence with attaching these COAs (item 4) to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 2, 3, 5, and 6) 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
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