

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, January 24, 2011 12:23 PM
To: Kubeczko, Dave
Subject: FW: Samson Resources Company, Lucero 32-7-11 #1, SWSW Sec 11 T32N R7W, La Plata County, Form 2A (#2565732) Review

Scan No 2033600

CORRESPONDENCE

2A#2567532

From: Kubeczko, Dave
Sent: Saturday, January 01, 2011 3:46 PM
To: gmitchell@samson.com
Subject: Samson Resources Company, Lucero 32-7-11 #1, SWSW Sec 11 T32N R7W, La Plata County, Form 2A (#2565732) Review

Georganne,

I have been reviewing the Lucero 32-7-11 #1 **Form 2A** (#2565732). COGCC would like to attach the following conditions of approval (COAs) based on the data Samson Resources 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 230 feet. COGCC guidelines also require designating all locations within close proximity to surface water 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., 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
2. **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.
 - 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 this COA 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

Colorado Oil & Gas Conservation Commission

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