

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, February 14, 2011 8:46 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Wexpro, Carl Allen 40 Pad, SWSW Sec 28 T12N R97W, Moffat County, Form 2A (#400123931) Review

Scan No 2033617

CORRESPONDENCE

2A#400123931

01/31/2011

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**From:** Dee Findlay [<mailto:Dee.Findlay@questar.com>]

**Sent:** Monday, January 31, 2011 2:34 PM

**To:** Kubeczko, Dave

**Subject:** RE: Wexpro, Carl Allen 40 Pad, SWSW Sec 28 T12N R97W, Moffat County, Form 2A (#400123931) Review

Dave,

- 1) Please make the necessary change to the distance from the nearest surface water to 660 feet.
- 2) Wexpro is in concurrence with the proposed COAs.

Thank you for your time

*Dee Findlay*

**WEXPRO COMPANY** | Permit Agent | PO Box 458 | 1955 Blairtown Rd. Rock Springs, WY 82902 | Office: (307) 352-7554 |  
Cell: (307) 354-6346 | [Dee.Findlay@Questar.com](mailto:Dee.Findlay@Questar.com)

**QUESTAR**

*\*\* I will be out of the office the 1st and 3rd Friday of each month \*\**

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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]

**Sent:** Monday, January 31, 2011 1:48 PM

**To:** Dee Findlay

**Subject:** Wexpro, Carl Allen 40 Pad, SWSW Sec 28 T12N R97W, Moffat County, Form 2A (#400123931) Review

Dee,

I have been reviewing the Carl Allen 40 Pad **Form 2A** (#400123931). COGCC requests the following clarifications regarding the data WexPro 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) to the Form 2A.

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 4789 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent, as well as, perennial streams. COGCC's review indicates there is an intermittent stream system (2009 Aerial Photograph) located approximately 660 feet to the east. I can make the change if you send me an email with this request.
2. **General:** The following conditions of approval (COAs) will apply:
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - 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 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 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.

COGCC would appreciate your concurrence with attaching these COAs (Item 2) to the Form 2A permit prior to passing the OGLA review. The other issue (Item 1) also needs 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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