

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, February 14, 2011 8:52 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Scan No 2033618

CORRESPONDENCE

2A#400120820

02/04/2011

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**From:** Bob Noonan [mailto:bob@banko1.com]  
**Sent:** Friday, February 04, 2011 9:21 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Dave,

Mesa aggress to all COAs for their 3 sites. Please find the note below from Mesa and let me know if all this looks okay to more forward with.

Thanks,

**Bob Noonan**

Regulatory Project Manager  
Banko Petroleum Management Inc.  
bob@banko1.com

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**From:** Dave Cesark [mailto:DCesark@mesa-energy.net]  
**Sent:** Wednesday, February 02, 2011 1:31 PM  
**To:** Bob Noonan  
**Subject:** RE: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Bob,  
I'm good with the COAs. We can make the reference area adjacent to the pad as Dave suggests and in the following cardinal directions:

- 26-7, northerly
- 9-13, westerly
- 15-10, northerly

It was the Form 2 that was previously submitted, not the 2A's (misread the email), so probably do need CDOW consultation, but will wait to hear back. Either way I plan to meet with CDOW-Meeker next Wednesday.

Thanks

Dave

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**From:** Bob Noonan [mailto:bob@banko1.com]  
**Sent:** Wednesday, February 02, 2011 12:00 PM  
**To:** Dave Cesark  
**Subject:** RE: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Dave,

I'm waiting to hear back from the commission on the PWSA, and I'll have to submit this question as well. We're not too sure in this office as to how that will work, as we haven't had the chance to repermit a location that was previously permitted under the old rules. Honestly I couldn't guess either way. I'll let you know when I hear back.

Spoke with the commission earlier, and they are reviewing the Stake Springs 2A, and the Form 12. No concerns on either.

**Bob Noonan**

Regulatory Project Manager  
Banko Petroleum Management Inc.  
bob@banko1.com

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**From:** Dave Cesark [mailto:DCesark@mesa-energy.net]  
**Sent:** Wednesday, February 02, 2011 11:16 AM  
**To:** Bob Noonan  
**Subject:** RE: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Bob,  
I'm confused- if we previously submitted Form 2As on all of these and this is an "Amend Existing Location" as Dave describes it, then do we still have to consult with CDOW?  
Dave

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**From:** Bob Noonan [mailto:bob@banko1.com]  
**Sent:** Wednesday, February 02, 2011 9:50 AM  
**To:** Dave Cesark  
**Subject:** FW: Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

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**Bob Noonan**

Regulatory Project Manager  
Banko Petroleum Management Inc.  
bob@banko1.com

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**From:** Kubezko, Dave [mailto:Dave.Kubezko@state.co.us]  
**Sent:** Tuesday, February 01, 2011 4:09 PM  
**To:** Bob Noonan  
**Subject:** Mesa Energy, BDU 15-10-199, NWSE Sec 15 T1S R99W, Rio Blanco County, Form 2A (#400120820) Review

Christopher,

I have been reviewing the BDU 15-10-199 **Form 2A** (#400120820). Since a Form 2 for this well location was submitted previously (05-29-2009) and approved (09-10-2009), this is not considered a New Location on the Form 2A, but rather an Amend Existing Location (Location #414180). I have made this change. COGCC requests the following clarifications regarding the data Mesa Energy 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 prior to permit approval.

1. **General:** Due to the potentially fractured nature of the surface material in this area, 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 6** - Reserve/drilling pit (if constructed) must be lined or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling.
  - COA 9** - Production pit (or any other pit used to hold/contain fluids) must be lined.

**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 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.

**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.

2. **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 (01/12/2011) 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 1) to the Form 2A permit prior to passing the OGLA review. The other issue (Item 2) 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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