

## Allison, Rick

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**From:** Kallasandra Moran [kmoran@petro-fs.com]  
**Sent:** Wednesday, April 20, 2011 9:04 AM  
**To:** Allison, Rick  
**Subject:** RE: CALVARY 18-33 FACILITY - COGCC review Form 2A (Doc 400150186) for Orr Energy LLC

Rick,

Please see notes in red below...

Thanks!

Kallasandra M. Moran  
Regulatory Analyst  
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**From:** Allison, Rick [<mailto:Rick.Allison@state.co.us>]  
**Sent:** Friday, April 08, 2011 3:45 PM  
**To:** Kallasandra Moran  
**Subject:** CALVARY 18-33 FACILITY - COGCC review Form 2A (Doc 400150186) for Orr Energy LLC

Hi Kallasandra,

The COGCC is reviewing the Form 2A oil and gas location assessment for the CALVARY 18-33 FACILITY location in the NWSE Sec18 T7N R65W, Weld County, and requests the following changes to the Form 2A submitted by Orr Energy LLC:

1. **Water Resources:** The location is a sensitive area due to the presence of shallow ground water. Therefore, please approve me changing the Sensitive Area Designation from No to Yes. **Orr Energy agrees with the change.**
2. **Water Resources:** The nearest surface water is a canal located 166 feet north of the location as indicated on the Hydrology Map. Therefore, please approve me changing the distance to nearest surface water from 622 feet to 166 feet. **Orr Energy agrees with the change.**
3. **Water Resources:** Did Orr Energy conduct a field investigation to verify whether the Jerald Steele well permit 274495 was constructed? Although the Division of Water Resources does not have completion information for this well, that does not necessarily indicate the well is not constructed where permitted. The proposed tank battery location may be in a sensitive area if it is within 1/8 mile of a domestic water well, in addition to the reasons above. **Orr Energy (or its agents) did not confirm the construction o the Steele water well. Orr Energy ahs agreed (above) to the change in determination.**
4. **BMPs:** While Orr has provided general BMPs for the construction and operation of a well site, what site-specific BMPs has Orr developed for the CALVARY 18-33 FACILITY location to protect the shallow ground water (and potentially a nearby domestic water well) from significant adverse environmental impacts? How will the battery be constructed to ensure a release of produced fluids does not cause impact to ground water? **Orr Energy will construct the battery as described in previous submitted**

BMP's and per surface owner request. Additional BMP's will be implemented at time of construction if necessary.

Please contact me if you have any questions regarding this Form 2A.

Best Regards,

Rick Allison, P.G.  
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Colorado Oil and Gas Conservation Commission  
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