

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, May 06, 2011 9:13 AM
To: Kubeczko, Dave
Subject: FW: Burlington Resources Oil & Gas, Levey 100 Pad, SENW Sec 13 T32N R7W, La Plata County, Form 2A (#400144324) Review

Scan No 2033805

CORRESPONDENCE

2A#400144324

From: Kubeczko, Dave
Sent: Tuesday, April 05, 2011 11:38 AM
To: Clugston, Patricia L
Subject: Burlington Resources Oil & Gas, Levey 100 Pad, SENW Sec 13 T32N R7W, La Plata County, Form 2A (#400144324) Review

Patsy,

I have been reviewing the Levey 100 Pad **Form 2A** (#400144324). COGCC requests the following clarifications regarding the data Burlington Resources Oil & Gas 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 the distance to the nearest surface water is 5022 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates two intermittent streams (also shown on the Hydrology Map) approximately 1374 feet to the northwest and 959 feet to southeast-east. I can make the change if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 200 feet bgs for a well located 225 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 137228-PachecoCV, domestic well) located approximately 429 feet to the south, with a total depth of 278 feet bgs, a depth to groundwater of 155 feet bgs, and a pumping rate of 5 gpm. I believe this is the well you located. I can make the change if you send me an email with this request. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area** and requiring the following condition of approval (COA):
COA 1 - Location is in a sensitive area due to shallow groundwater; therefore the reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system must be implemented during drilling.
3. **General:** The following conditions of approval (COAs) will also 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 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 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 49 - The production pit must be fenced. If the production pit is not closed (either drained and/or backfilled) immediately after natural gas development activities, then operator must appropriately net the production pit, in a timely manner, and maintain the fencing and netting until the pit is closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels.

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

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