

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, July 19, 2011 12:01 PM
To: Kubeczko, Dave
Subject: FW: Energen Resources Corporation, Navajo Lake 32-5 21-2, NWNE Sec 20 T32N R5W, Archuleta County, Form 2A (#1636484) Review

Categories: Orange - Operator Correspondence

Scan No 2033931 CORRESPONDENCE 2A#1636484

From: Doug Thomas [<mailto:Doug.Thomas@energen.com>]
Sent: Wednesday, June 15, 2011 9:56 AM
To: Kubeczko, Dave
Subject: RE: Energen Resources Corporation, Navajo Lake 32-5 21-2, NWNE Sec 20 T32N R5W, Archuleta County, Form 2A (#1636484) Review

Dave this well will be drilled with a close-looped system and all these COA's are well within our scope of planned activity. Energen does not have a problem meeting any of these COA's.

*Doug Thomas
Drilling Superintendent
Energen Resources
2010 Afton Place
Farmington, NM 87401
324-4127 wk
330-1954 cell*

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Sunday, June 12, 2011 3:57 PM
To: Doug Thomas
Subject: Energen Resources Corporation, Navajo Lake 32-5 21-2, NWNE Sec 20 T32N R5W, Archuleta County, Form 2A (#1636484) Review

Resent due to wrong county in subject line.

Doug,

I have been reviewing the Navajo Lake 32-5 21-2 **Form 2A** (#1636484). COGCC would like to attach the following conditions of approval (COAs) based on the data Energen 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 30 feet. COGCC guidelines require designating all locations within close proximity to surface water a *sensitive area*. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water; therefore, 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 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 45 feet bgs for a well located 287 feet from the proposed well. COGCC's guidelines require designating all locations within close proximity within $\frac{1}{8}$ of a mile (660 feet) of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:

COA 7 - Location is in a sensitive area because of proximity to a domestic water well; therefore Reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system (which operator has indicated on the Form 2A – Section 6. Construction) must be implemented during drilling.

COA 8 - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits, if constructed, must be lined.

3. **General Site:** 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.

COA 25 - Flowback and stimulation fluids must be sent to tanks and/or filters before the fluids can be placed into any pipeline or pit. 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.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs 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
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



 Please consider the environment before printing this e-mail