

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Friday, October 07, 2011 8:29 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Vecta Oil & Gas Ltd, Vecta 3-18-2-97 Pad, SESW Sec 18 T2N R97W, Rio Blanco County, Form 2A #400185158 Review

**Categories:** Orange - Operator Correspondence

Scan No 2034028      CORRESPONDENCE      2A#400185158

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**From:** Kim Rodell [<mailto:kim@banko1.com>]  
**Sent:** Monday, September 26, 2011 11:27 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Vecta Oil & Gas Ltd, Vecta 3-18-2-97 Pad, SESW Sec 18 T2N R97W, Rio Blanco County, Form 2A #400185158 Review

Dave,

Vecta Oil & Gas Agrees to abide by all COAs set forth below. The federal APD has not yet been approved. Vecta does not have the final COAs with wildlife stipulations.

Kimberly J. Rodell  
Regulatory Project Manager  
Banko Petroleum Management, Inc.  
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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, September 19, 2011 4:14 PM  
**To:** Kim Rodell  
**Subject:** Vecta Oil & Gas Ltd, Vecta 3-18-2-97 Pad, SESW Sec 18 T2N R97W, Rio Blanco County, Form 2A #400185158 Review

Kim,

I have been reviewing the Vecta 3-18-2-97 Pad **Form 2A** (#400185158). COGCC would like to attach the following conditions of approval (COAs) based on the information Vecta Oil & Gas has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General:** The following conditions of approval (COAs) will apply:
  - COA 6a** - Any pit constructed to hold liquids, must be lined or a closed loop system must be implemented during drilling.
  - COA 23** - Operator must ensure secondary containment for any volume of fluids (excluding freshwater) 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 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface or buried pipelines.

**COA 44** - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, could Vecta provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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