

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, November 16, 2011 3:59 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Resend: Dejour Energy (USA) Corporation, Federal 21A Pad, SWSE Sec 21 T6S R91W, Garfield County, Form 2A #2588416 Review

**Categories:** Orange - Operator Correspondence

Scan No 2034060      CORRESPONDENCE      2A#2588416

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**From:** Gary Haefele [mailto:ghaefele@dejour.com]  
**Sent:** Wednesday, November 09, 2011 7:02 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Resend: Dejour Energy (USA) Corporation, Federal 21A Pad, SWSE Sec 21 T6S R91W, Garfield County, Form 2A #2588416 Review

Thanks. We will fwd to you the BLM wildlife stipulations for Pad 21A.

Gary

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Tuesday, November 08, 2011 3:24 PM  
**To:** ghaefele@dejour.com  
**Subject:** Resend: Dejour Energy (USA) Corporation, Federal 21A Pad, SWSE Sec 21 T6S R91W, Garfield County, Form 2A #2588416 Review

Gary,

Below is the email sent on 10-07-11. 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](mailto:dave.kubeczko@state.co.us)



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**From:** Kubeczko, Dave  
**Sent:** Friday, October 07, 2011 2:30 PM  
**To:** [ghaefe@dejour.com](mailto:ghaefe@dejour.com)  
**Subject:** Dejour Energy (USA) Corporation, Federal 21A Pad, SWSE Sec 21 T6S R91W, Garfield County, Form 2A #2588416 Review

Gary,

I have been reviewing the Federal 21A Pad **Form 2A** (#2588416). COGCC would like to attach the following conditions of approval (COAs) based on the data Dejour Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

- General:** The following conditions of approval (COAs) will apply:
  - COA 91** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to construction of the pit.
  - COA 41** - A Form 15 Earthen Pit Permit must be submitted to the COGCC Location Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and approval must be obtained prior to construction of the completion/flowback fluids/production pit.
  - COA 26** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to start of pit and fracing operations.
  - 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 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 48** - If there are changes to the pit construction (i.e. changes from the submitted construction layout drawings), then the operator must submit a professional engineer (PE) approved/stamped as-built drawing (plan view and cross-sections) of the completion/flowback/production pit within 30 calendar days of construction.
  - COA 49** - The completion/flowback fluids/production pit must be fenced and netted. The operator must 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.
  - 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 20** – A surface water sample from the unnamed stream located to the northeast shall be collected prior to pit use and every 12 months to evaluate potential impacts from pit operations. At a minimum, the surface

water samples will be analyze for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

**COA 21** - Prior to pit closure, operator must submit E&P waste disposal information (if different from the Form 15) via a Form 4 Sundry Notice to the COGCC Location Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Environmental Supervisor for Western Colorado ([alex.fischer@state.co.us](mailto:alex.fischer@state.co.us))for approval.

**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 31** - The liner in the cuttings pits must be removed and disposed of offsite prior to final disposal of drill cuttings in the pit.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, could Dejour provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. These COAs will also be placed on the Form 15 Earthen Pit Permit. 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  
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