

**From:** [Smalley, Carl](#)  
**To:** [Koepsell, Arthur](#)  
**Cc:** [Tritt, Tannis](#)  
**Subject:** RE: ETW 1-15 FORM 2A# 400230627, Mull Drilling  
**Date:** Tuesday, December 13, 2011 9:59:05 AM

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Arthur

I concur with your directive for reporting H2S. I made reference to this issue on my BMP's document (Site specific).

Mull Drilling Company Inc.  
Carl Smalley  
Environmental Manager  
office 719-767-8805  
cell 719-342-1812

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**From:** Koepsell, Arthur [Arthur.Koepsell@state.co.us]  
**Sent:** Tuesday, December 13, 2011 9:20 AM  
**To:** Smalley, Carl  
**Subject:** ETW 1-15 FORM 2A# 400230627, Mull Drilling

Carl,

The COGCC is reviewing the Form 2A (#400230627) for the Mull Drilling ETW 1-15 location, located in the SWSW Sec 15 T18S R45W Kiowa County, Colorado. The COGCC requests the following changes regarding the data submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

Hydrogen Sulfide

Due to the presence of hydrogen sulfide in the oil and gas fields surrounding the proposed location the following COA will apply to the ETW 1-15 location.

In accordance with Rule 607.c., operator shall provide notice of any gas analysis indicating the presence of hydrogen sulfide on the proposed location including pipelines, production equipment and tanks. Submit notices to COGCC's area engineer, Dirk Sutphin, at [dirk.sutphin@state.co.us](mailto:dirk.sutphin@state.co.us) <<mailto:dirk.sutphin@state.co.us>> and local government designee, Debra Lening at [kiowaclerk@hotmail.com](mailto:kiowaclerk@hotmail.com) <<mailto:kiowaclerk@hotmail.com>> follows:

1) Reporting of the presence of H2S in concentrations less than 10 parts per million (PPM) shall be done via verbal and email notices. Verbal notice with a follow up email shall be provided as soon as practicable upon detection of H2S to COGCC's area engineer and the local government designee.

2) All verbal and email notices shall include all of the following information:

- a) Well or Facility name,
- b) API Number or COGCC Facility Number,
- c) H2S concentration in PPM,
- d) Date sample or measurement was collected,
- e) Type of measurement or analysis (e.g., gas analysis, meter measurement, or colorimetric tube), and
- f) Description of sample point.

3) Sundry Notices are required for H2S concentrations equal to or exceeding 10 PPM. Only one H2S Sundry Notice Form 4 is required per well or location following the initial H2S detection, which exceeds 10 parts per million (PPM). Subsequent H2S reporting shall be done on an annual basis and be submitted not later than January 31 for all measurements or sampling events during the prior calendar year.

4) Subsequent annual reports shall be provided in a spreadsheet and submitted to the COGCC's area engineer and/or COGCC's engineering supervisor via email.

5) Sundry Notices and annual report spreadsheets shall provide all of the following information:

- a) Well or Facility name
- b) API Number or COGCC Facility Number
- c) H2S concentration in PPM

If you have any questions or concerns please feel free to contact me.

Thanks,

Arthur

Arthur W. Koepsell, P.G.  
Oil & Gas Location Assessment Specialist  
Southern Area

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