

## Kubeczko, Dave

---

**From:** Kubeczko, Dave  
**Sent:** Monday, May 14, 2012 3:20 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 3-44 Pad, Lot 20 Sec 3 T1N R100W, Rio Blanco County, Form 2A #400236817 Review  
**Attachments:** FG 3-44 3160-5 AAPD Extension.pdf  
**Categories:** Orange - Operator Correspondence

Scan No 2034348      CORRESPONDENCE      2A#400236817

Verbally concurred on 04-09-2012.

---

**From:** Sheryl Myers [<mailto:Sheryl@myersenergyservices.com>]  
**Sent:** Monday, April 09, 2012 2:44 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 3-44 Pad, Lot 20 Sec 3 T1N R100W, Rio Blanco County, Form 2A #400236817 Review

Hi Dave

Bob Behner & Dave Jensen are looking at the COGCC COA's you've listed  
I'm attaching the COA's from BLM, and the rest of the Exhibits.

970-878-9827

---

**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, April 09, 2012 1:37 PM  
**To:** Robert Behner  
**Cc:** Sheryl Myers  
**Subject:** Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 3-44 Pad, Lot 20 Sec 3 T1N R100W, Rio Blanco County, Form 2A #400236817 Review

Robert,

I have been reviewing the Fletcher Gulch Shallow Unit 3-44 Pad **Form 2A** (#400236817). COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the data Genesis Gas & Oil 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 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, 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 or buried permanent pipelines.
  - COA 25** - If the well is to be frac'd, 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, if drill cuttings are to remain/disposed of onsite, they must also meet the applicable standards of table 910-1.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, could Genesis Gas & Oil 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**

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)



 Please consider the environment before printing this e-mail