

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 15, 2012 9:44 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 34-41A Pad, SWSW Sec 34 T2N R100W, Rio Blanco County, Form 2A #400236861 Review  
**Attachments:** FGSU 34-41A 3160-3+COA.pdf; WR 11 Fragile\_Saline Soil.doc  
**Categories:** Orange - Operator Correspondence

Scan No 2034364      CORRESPONDENCE      2A#400236861

Verbally concurred on 05-15-12.

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**From:** Sheryl Myers [<mailto:Sheryl@myersenergyservices.com>]  
**Sent:** Tuesday, May 15, 2012 9:20 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 34-41A Pad, SWSW Sec 34 T2N R100W, Rio Blanco County, Form 2A #400236861 Review

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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, May 14, 2012 4:45 PM  
**To:** Sheryl Myers  
**Subject:** FW: Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 34-41A Pad, SWSW Sec 34 T2N R100W, Rio Blanco County, Form 2A #400236861 Review

Sheryl,

I never received anything for this pad. Thanks.

Dave

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**From:** Kubeczko, Dave  
**Sent:** Sunday, April 22, 2012 11:33 AM  
**To:** 'Robert Behner'  
**Cc:** 'Sheryl Myers'  
**Subject:** Genesis Gas & Oil LLC, Fletcher Gulch Shallow Unit 34-41A Pad, SWSW Sec 34 T2N R100W, Rio Blanco County, Form 2A #400236861 Review

Robert,

I have been reviewing the Fletcher Gulch Shallow Unit 34-41A Pad **Form 2A** (#400236861). COGCC requests the following clarifications regarding 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. In addition, COGCC would like to attach the following conditions of approval (COAs) to the Form 2A.

1. **Rule 303.d.(3).H.:** If the oil and gas location disturbance is to occur on lands with a slope ten percent (10%) or greater, or one (1) foot of elevation gain or more in ten (10) foot distance, then the following shall be required: i. Construction layout drawing (construction and operation); and ii. Location cross-section plot (construction and

operation). Please provided Construction Layout Drawings that show the dimensions and layout of this well pad. Cross-sections are also needed.

2. **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 hydraulically stimulated, 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**

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