

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, May 17, 2012 5:20 AM
To: Kubeczko, Dave
Subject: FW: Robery L Bayless Producer, Weaver Ridge 23-7H Pad, SWNE Sec 23 T1S R104W, Rio Blanco County, Form 2A #400267773 Review

Categories: Orange - Operator Correspondence

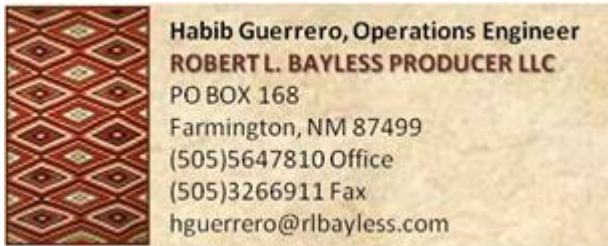
Scan No 2034375 CORRESPONDENCE 2A#400267773

From: Habib Guerrero [<mailto:hguerrero@rlbayless.com>]
Sent: Wednesday, April 11, 2012 8:22 AM
To: Kubeczko, Dave
Subject: RE: Robery L Bayless Producer, Weaver Ridge 23-7H Pad, SWNE Sec 23 T1S R104W, Rio Blanco County, Form 2A #400267773 Review

David,

Thanks a lot for your email. We have reviewed the COAs listed for both wells and we agree to all of them. In regards to the release from around the wellhead since the BLM onsite of 03-15-12? The release was cleaned out on 03-22-12.

Best Regards,
Habib



From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Tuesday, April 10, 2012 1:04 PM
To: Habib Guerrero
Subject: Robery L Bayless Producer, Weaver Ridge 23-7H Pad, SWNE Sec 23 T1S R104W, Rio Blanco County, Form 2A #400267773 Review

Habib,

I have been reviewing the Weaver Ridge 23-7H Pad **Form 2A** (#400267773). COGCC will attach the following conditions of approval (COAs) based on the data Robert L. Bayless Producer has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. As a side note; has Bayless remediated the release from around the wellhead since the BLM onsite of 03-15-12?

1. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds (OBM) be used? has been marked **Yes**; therefore the following condition of approval (COA) will apply:
COA 11 - A closed loop system must be implemented during drilling (which operator has indicated on the Form 2A); or, if a drilling pit is constructed, it must be lined. All cuttings generated during drilling with oil based muds or high chloride/TDS mud must be kept in the lined drilling pit, or placed either in containers or on a lined/bermed portion of the well pad; prior to offsite disposal. 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.

COA 12 - Any pit constructed to hold oil based muds or salt based fluids and/or cuttings must be lined.

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 49 - For pits containing fluids other than freshwater only; the pit must be fenced. If the pit is not drained, or closure has not begun within 30 days after last use for well completion, the pit must be netted. The operator must maintain the fencing and netting until the pit is closed.

2. **General:** The following conditions of approval (COAs) will apply:

COA 23 - Operator must ensure 110 percent 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 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via buried or temporary surface pipelines.

COA 38 - The moisture content of any freshwater generated 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 the freshwater generated drill cuttings are to be onsite, they must also meet the applicable standards of table 910-1.

COA 47 - If a pit is constructed, a form 15 Earthen Pit Permit must be submitted and approved prior to construction/use of the completions pit.

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 90 - Notify COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to start of construction of the well pad, start of construction of the pit (if different), pit liner installation, and start of fracing operations (via Form 42).

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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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