

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Friday, June 01, 2012 1:07 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: SG Interests I, Federal 11-90-24 #3 Pad, Lot 4 Sec 24 T11S R90W, Gunnison County, Form 2A#400251597; COGCC's Response to LGD Comments  
**Attachments:** Scan No. 2034387\_SG Interests I LTD, Federal 11-90-24 #3 Pad\_COGCC Response to LGD Comments\_2A#400251597\_06012012.pdf; Scan No. 2034388\_SG Interests I LTD, Federal 11-90-24 #3 Pad\_Pipeline Location Drawing\_2A#400251597\_06012012.pdf  
**Categories:** Dark Teal Category

Scan No 2034387

COGCC Response to Gunnison County LGD Comments

2A#400251597

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**From:** Kubeczko, Dave  
**Sent:** Friday, June 01, 2012 12:56 PM  
**To:** 'David Baumgarten'  
**Cc:** Neal Starkebaum; Brenda Wiseman  
**Subject:** SG Interests I, Federal 11-90-24 #3 Pad, Lot 4 Sec 24 T11S R90W, Gunnison County, Form 2A#400251597; COGCC's Response to LGD Comments

David,

COGCC appreciates Gunnison County's participation in the LGD comment portion of the Form 2A permitting process. Attached is COGCC's Responses to Gunnison County's Comments submitted on February 28, 2012 for SG Interests', Federal 11-90-24 #3 Pad, 2A#400251597. These responses will become an attachment to the Form 2A. 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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**Gunnison County LDG Comments**  
**Regulatory Form 400251597**  
**SG Interests I Ltd; Federal 11-90-24 #3 Pad; Gunnison County**

**Comments submitted on February 28, 2012:**

COGCC's responses to Gunnison County's LGD Comments are indicated below shown in blue text following each comment.

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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**Comment No. 1 - WATER QUALITY.**

Form 2A at 14 indicates that the proposed site is in a Rule 901.e sensitive area. The distance (in feet) to the nearest surface water is 210 feet. The Sensitive Area Determination indicates:

The proposed location is a sensitive area

There are surface waters adjacent to or within 1/4 mile of the proposed site;

A potential release could reach surface water features;

The potential impact to surface water is low because the drainage pattern from the well to nearby surface waters leads to a drainage just beyond the quarter-mile radius;

The stock pond may have higher potential for impacts depending on to where it is moved. The stock pond may or may not be reconstructed on an existing drainage;

That the proposed facility would have pits that will contain hydrocarbons and chlorides or other E P wastes;

That the depth to groundwater is unknown.

Gunnison County requests that design and construction elements be required and inspected to ensure that a potential release will not reach surface water features.

**COGCC Response to Comment No. 1 - WATER QUALITY.**

COGCC is in agreement that this location is in a sensitive area due to close surface water and because of the potential for shallow groundwater being present at this site (COGCC's review indicates that groundwater is likely present at approximately 75 feet below ground surface as indicated on the Form 2A). COGCC has placed the following COAs on this permit to address nearby surface water and potential shallow groundwater concerns:

**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 44** - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters.

**COA 46** - The surface soils and materials are fine-grained (clay and clay loams) and highly unconsolidated; therefore appropriate BMPs need to be in place during all pad construction, as well as drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

**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 7** - Location is in a sensitive area because of the potential for shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

**COA 8** - Location is in a sensitive area because of the potential for shallow groundwater; therefore any pits constructed to hold fluids (i.e., production pit, frac pit, reserve pit) must be lined.

**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 entire level pad will be surrounded by a berm to contain any potential release on the well pad. The berm is approximately 2 ½ feet in height around the pad except at the entrance where it is approximately 1 1/2 feet in height to allow vehicles to drive over it. Tanks will be set on compacted earth in an area of the pad that has been constructed on cut soils.

**COA 11** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface pipelines or configuration of the permanent pipeline network.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC believes that the above COAs are sufficient for the protection of both nearby surface water and shallow groundwater at this location. The use of lined pits at similar locations has proven to be effective in protecting surface water and groundwater.

#### **Comment No. 2 - ACCESS PERMIT.**

Gunnison County requests that the applicant be required by COGCC to obtain from Gunnison County the necessary access permit for road construction to this site.

#### **COGCC Response to Comment No. 2 - ACCESS PERMIT.**

Based on COGCC's review and discussions with SG Interests concerning the access, the proposed access road does not originate from a county or state road and therefore is part of the Surface Use Agreement between SG and the surface landowner. As stated in Gunnison County's permit:

**The access road shall be maintained in compliance with the Stormwater Management Plan.**

#### **Comment No. 3 - ONSITE INSPECTIONS.**

Gunnison County requests the COGCC conduct onsite inspection of the site before and during drilling to ensure the pad and structures are built to standards.

#### **COGCC Response to Comment No. 3 - ONSITE INSPECTIONS.**

The following condition of approval has been placed on this Form 2A permit and address the COGCC's new notification policy using the new **Form 42, "Notice of Notification (Notice of Hydraulic Fracturing)"**. COGCC will try to conduct inspections during the operations at this well pad location, based on timing and staff availability.

**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)), the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) and the

COGCC Field Inspector for Mesa Delta, and Gunnison Counties (Chuck Browning; email [chuck.browning@state.co.us](mailto:chuck.browning@state.co.us)) 48 hours prior to start of pad construction, pit liner installation, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**Comment No. 4 - FUTURE GAS AND WATER LINES NOT IDENTIFIED.**

Future gas and water lines to serve this proposed site have not been identified. Gunnison County requests that such identification (including routes) be made before this application is acted upon.

**COGCC Response to Comment No. 4 - FUTURE GAS AND WATER LINES NOT IDENTIFIED.**

SG Interests has provided a map showing the proposed locations for the gas and water pipelines and this map has been made an attachment to the Form 2A.

Thank you,

David Baumgarten  
Gunnison County Attorney  
Local Government Designee

**Federal 11-90-24 Natural Gas Wells Project**  
SG Interests I Ltd

Community Bldg  
BM 7114

Muddy Creek

7230

7114

7460

7570

7600

7710

7550

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7200

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State Highway 133

-  Existing Pipeline
-  Planned Pipeline Route
-  Existing Private Road
-  Public Road
-  Planned Access Road
-  Planned Well Pad