

Allison, Rick

From: Allison, Rick
Sent: Monday, June 11, 2012 2:36 PM
To: 'David Blandford'
Subject: RE: Holton 24-12 Form 2A 2288424

David

I have added your comments regarding Waste Management to the Form 2A. I have changed the depth to water to 35 feet, consistent with your other Form 2A. I have changed the mud disposal from offsite-landfarming to offsite-land spreading.

I have applied the following two COAs to this location:

1. 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, the drill cuttings must also meet the applicable standards of Table 910-1.
2. If drill cuttings will be land applied, then a Waste Management Plan meeting the general requirements of Rule 907.a. must be submitted for the land application of drill cuttings. Submit the Waste Management Plan on a Form 4 Sundry Notice via email to ogccenvirosundry@state.co.us prior to moving the cuttings from the location.

Note that if the cuttings are buried onsite or trucked to a landfill, then no action will need to be taken regarding COA #2. However, if your contractor hauls the cuttings along with the mud for offsite spreading, then the Form 4 Cuttings Waste Management Plan needs to be submitted first.

I have passed this 2A for final approval.

Please let me know if you have any questions.
Rick

From: David Blandford [mailto:andeleeenergy@gmail.com]
Sent: Monday, June 11, 2012 11:27 AM
To: Allison, Rick
Subject: Re: Holton 24-12 Form 2A 2288424

Rick:

Drilling cuttings will be buried on site, as per COGCC rules. If shallow groundwater is encountered, the cuttings will be hauled to a commercial disposal facility. Drilling mud will be hauled from location by commercial truck and land spread at a site contracted by our water hauling company. Produced water will be stored in a produced water tank and hauled to a commercial disposal facility as needed. Flowback water will be contained in flowback tanks and hauled to a commercial disposal facility as needed.

Please contact me with any other questions. Thanks.

MATRIX ENERGY, LLC
David Blandford, PE
Co-Manager

On Wed, May 23, 2012 at 7:50 AM, Allison, Rick <Rick.Allison@state.co.us> wrote:

David,

We try to look at several wells in the area, the topography and surface geology to make a determination. We try to find wells that are screened in the shallow unconsolidated material so that we are not using a static water level from a screen interval in a deeper aquifer.

However, this location is also a Sensitive Area by Rule because it is within 1/8 mile of a domestic water well. Therefore, the presence of shallow ground water is less of an argument.

Please revise the waste management plan to accurately reflect your intended mud and cuttings disposal. Please also include your statements below regarding flowback and production wastes.

Thank you

Rick

From: David Blandford [<mailto:andeleenergy@gmail.com>]
Sent: Sunday, May 20, 2012 3:24 PM
To: Allison, Rick
Subject: Re: Holton 24-12 Form 2A 2288424

Rick:

Flowback fluids will be contained within flowback tanks. They will emptied in a timely manner, with the oil being transferred to production tanks when they get set. All flowback water will be transported by vacuum truck to commercial disposal facilities. Produced water will be contained within a produced water tank, which will be emptied as necessary and transported by vacuum truck to a commercial disposal facility.

Cuttings will be buried on location, in accordance with COGCC rules.

the distance to the nearest surface water is 1132' to a ditch. The nearest water well is 601' away from the proposed well. The water well permit for that well was attached to our permit application. I could find out the depth to groundwater from that or from other wells in the area. Do you know another way to determine the depth to groundwater? I am not convinced that this is a sensitive area.

I will be on vacation for the next couple of weeks. If I am not prompt in response to questions or emails, I apologize. Thanks.

David Blandford

On Fri, May 18, 2012 at 10:57 AM, Allison, Rick <Rick.Allison@state.co.us> wrote:

David,

I am reviewing the Form 2A location assessment for the Matrix Energy Holton 24-12 location in Weld County. I have the following questions or comments:

- 1. Waste Management Plan:** Please provide additional detail regarding how the various E&P waste streams will be stored and handled on the location.
- 2. Cuttings Disposal:** If drill cuttings will be spread on agricultural fields, a Form Sundry Notice needs to be submitted prior to moving the cuttings to the spread field location. The following Condition Of Approval will apply to this location: "If drill cuttings will be land applied, then a Waste Management Plan meeting the general requirements of Rule 907.a. must be submitted for the land application of drill cuttings. Submit the Waste Management Plan on a Form 4 Sundry Notice via email to ogccenvirosundry@state.co.us prior to moving the cuttings from the location."
- 3. Water Resources:** No information regarding the depth to ground water, distance to surface water or distance to the nearest water well was provided. Please provide this information. Note that areas with shallow ground water and locations within 1/8 mile of a domestic water well are considered Sensitive Areas by COGCC.

Please contact me with any questions.

Rick Allison, P.G.

Oil and Gas Location Assessment Specialist

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