

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, June 29, 2012 7:22 AM
To: Kubeczko, Dave
Subject: FW: SWEPI LP, Dry Sage 1-23 Pad, Lot 17 Sec 23 T12N R90W, Moffat County, Form 2A # 400290359 Review

Categories: Orange - Operator Correspondence

Scan No 2034431 CORRESPONDENCE 2A#400290359

From: A.Baldrige@shell.com [<mailto:A.Baldrige@shell.com>]
Sent: Friday, June 22, 2012 10:50 AM
To: Kubeczko, Dave
Subject: FW: SWEPI LP, Dry Sage 1-23 Pad, Lot 17 Sec 23 T12N R90W, Moffat County, Form 2A #400290359 Review

Dave,

Shell agrees to the Conditions of Approval outlined below for Dry sage 1-23.

Thanks,
Anne

Anne Baldrige
Regulatory Consultant
Office: (303) 305-7555
Mobile: (970) 593-8723
a.baldrige@shell.com

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Thursday, June 14, 2012 2:57 PM
To: Bergstrom, Michael L SEPCO-UAS/E/USON
Subject: SWEPI LP, Dry Sage 1-23 Pad, Lot 17 Sec 23 T12N R90W, Moffat County, Form 2A #400290359 Review

Michael,

I have been reviewing the Dry Sage 1-23 Pad **Form 2A** #400290359. COGCC would like to attach the following conditions of approval (COAs) based on the information SWEPI LP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

- 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.
- 2. Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2035 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes

ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates an intermittent stream located approximately 397 feet to the east-southeast. COGCC has made this change.

3. **General:** The following condition of approval (COA) will apply:

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.

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

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



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