

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, August 29, 2012 1:14 PM
To: Kubeczko, Dave
Subject: FW: Gulfport Energy Corporation, Sandrock 33-14-1 Pad, Lot 10 Sec 14 T6N R91W, Moffat County, Form 2A (#400308491) Review

Categories: Orange - Operator Correspondence, Brown - 2A Review Email to Operator

Scan No 2034499 CORRESPONDENCE 2A#400308491

From: Kubeczko, Dave
Sent: Wednesday, August 29, 2012 1:12 PM
To: 'David Segobia'
Subject: Gulfport Energy Corporation, Sandrock 33-14-1 Pad, Lot 10 Sec 14 T6N R91W, Moffat County, Form 2A (#400308491) Review

Dave,

I have been reviewing the Sandrock 33-14-1 Pad **Form 2A** (#400308491). COGCC will attach the following conditions of approval (COAs) to the Form 2A based on the data Gulfport Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

- 1. Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 244 feet. COGCC guidelines require designating all locations with close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) a **sensitive area** and requiring the following condition of approval (COA):
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
 - COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Proposed BMPs attachment); 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.
- 2. Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 40 feet bgs for a well located 1561 feet from the proposed well pad. The following conditions of approval (COAs) will apply:
 - COA 4** - Location may be in a sensitive area due to shallow groundwater; therefore, any pit constructed to hold fluids must be lined, or a closed loop drilling system (which operator has indicated on the Form 2A) must be implemented.
- 3. 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 closed loop system drilling rig is not used/available, then an amended Form 2A will need to be submitted/approved to include a drilling pit, and a Form 15 Earthen Pit Permit will also need to be submitted/approved prior to construction of the pit (the drilling pit will be required to be lined, fenced, and netted). All cuttings generated during drilling with oil based muds or high chloride/TDS mud must be kept in containers, a lined/bermed portion of the well pad, or the lined drilling (if permitted and constructed) 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.

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

COA 90 - Notify the COGCC 48 hours prior to start of pad construction, pit liner installation (if applicable), 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).

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, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

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.

Based on the information provided in the Form 2A by Gulfport, COGCC will attach these COAs to the Form 2A permit, Gulfport does not need to respond, unless you have questions or concerns with details in this email. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

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