

FORM

2

Rev  
12/05

## State of Colorado

## Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

400266057

Date Received:

03/28/2012

PluggingBond SuretyID

20120093

## APPLICATION FOR PERMIT TO:

1. ☒ Drill, ☐ Deepen, ☐ Re-enter, ☐ Recomplete and Operate

## 2. TYPE OF WELL

OIL ☒ GAS ☐ COALBED ☐ OTHER \_\_\_\_\_  
 SINGLE ZONE ☐ MULTIPLE ☒ COMMINGLE ☒

Refiling ☐Sidetrack ☐

3. Name of Operator: FIRST LIBERTY ENERGY INC

4. COGCC Operator Number: 10406

5. Address: 160 W CAMINO REAL #221

City: BOCA RATON State: FL Zip: 33432

6. Contact Name: Kallasandra Moran Phone: (307)256-2170 Fax: (303)962-6237

Email: kmoran@petro-fs.com

7. Well Name: Basin Well Number: # 1

8. Unit Name (if appl): Unit Number:

9. Proposed Total Measured Depth: 9000

## WELL LOCATION INFORMATION

10. QtrQtr: NESE Sec: 9 Twp: 40N Rng: 5E Meridian: N

Latitude: 37.726122 Longitude: -106.425207

Footage at Surface: 1900 feet FNL/FSL 660 feet FEL/FWL  
 FSL FEL

11. Field Name: Del Norte Field Number: 16210

12. Ground Elevation: 8176 13. County: RIO GRANDE

## 14. GPS Data:

Date of Measurement: 02/25/2012 PDOP Reading: 1.5 Instrument Operator's Name: Terry Sanders / PFS

15. If well is ☐ Directional ☐ Horizontal (highly deviated) submit deviated drilling plan.

Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL FEL/FWL

Sec: Twp: Rng: Sec: Twp: Rng:

16. Is location in a high density area? (Rule 603b)? ☐ Yes ☒ No

17. Distance to the nearest building, public road, above ground utility or railroad: 620 ft

18. Distance to nearest property line: 660 ft 19. Distance to nearest well permitted/completed in the same formation(BHL): 527 ft

## 20. LEASE, SPACING AND POOLING INFORMATION

Objective Formation(s)	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
Dakota	DKTA			
Entrada	ENRD			
Mancos	MNCS			

21. Mineral Ownership: ☒ Fee ☐ State ☐ Federal ☐ Indian Lease #: \_\_\_\_\_22. Surface Ownership: ☒ Fee ☐ State ☐ Federal ☐ Indian23. Is the Surface Owner also the Mineral Owner? ☒ Yes ☐ No Surface Surety ID#:23a. If 23 is Yes: Is the Surface Owner(s) signature on the lease? ☒ Yes ☐ No

23b. If 23 is No: ☐ Surface Owners Agreement Attached or ☐ \$25,000 Blanket Surface Bond ☐ \$2,000 Surface Bond ☐ \$5,000 Surface Bond

24. Using standard QtrQtr, Sec, Twp, Rng format enter entire mineral lease description upon which this proposed wellsite is located (attach separate sheet/map if you prefer):

T40N-R5E: Sec. 9: SE/4; Sec. 10: SW/4; Sec. 14: SW/4NW/4; Sec. 15: NE/4; NW/4; NE/4SW/4 & W/2SW/4; Sec. 18: SW/4NE/4 & SE/4SW/4; Sec. 23: S/2NE/4; Sec. 24: S/2NE/4 & SW/4NE/4;

25. Distance to Nearest Mineral Lease Line: 660 ft 26. Total Acres in Lease: 1080

### DRILLING PLANS AND PROCEDURES

27. Is H2S anticipated? ☐ Yes ☒ No If Yes, attach contingency plan.

28. Will salt sections be encountered during drilling? ☐ Yes ☒ No

29. Will salt (>15,000 ppm TDS CL) or oil based muds be used during drilling? ☐ Yes ☒ No

30. If questions 28 or 29 are yes, is this location in a sensitive area (Rule 901.e)? ☐ Yes ☒ No

31. Mud disposal: ☒ Offsite ☐ Onsite

If 28, 29, or 30 are "Yes" a pit permit may be required.

Method: ☐ Land Farming ☐ Land Spreading ☒ Disposal Facility Other: \_\_\_\_\_

Note: The use of an earthen pit for Recompletion fluids requires a pit permit (Rule 905b). If air/gas drilling, notify local fire officials.

Casing Type	Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CONDUCTOR	20	16	75	0	80	60	80	0
SURF	12+1/4	9+5/8	36	0	1,200	400	1,200	0
1ST	7+7/8	5+1/2	17	0	9,000	1,600	9,000	1,000

32. BOP Equipment Type: ☒ Annular Preventer ☒ Double Ram ☐ Rotating Head ☐ None

33. Comments Nearest well in same formation is Jynnifer # 1 (05-105-06003) and was PA'd 7/29/1988.

34. Location ID: \_\_\_\_\_

35. Is this application in a Comprehensive Drilling Plan ? ☐ Yes ☐ No

36. Is this application part of submitted Oil and Gas Location Assessment ? ☒ Yes ☐ No

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: \_\_\_\_\_ Print Name: Kallasandra M. Moran

Title: Regulatory Analyst Date: 3/28/2012 Email: kmoran@petro-fs.com

Operator must have a valid water right or permit allowing for industrial use or purchased water from a seller that has a valid water right or permit allowing for industrial use, otherwise an application for a change in type of use is required under Colorado law. Operator must also use the water in the location set forth in the water right decree or well permit, otherwise an application for a change in place of use is required under Colorado law. Section 37-92-103(5), C.R.S. (2011).

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: Matthew Lee Director of COGCC Date: 10/4/2012

#### API NUMBER

05 105 06019 00

Permit Number: \_\_\_\_\_ Expiration Date: 10/3/2014

#### CONDITIONS OF APPROVAL, IF ANY:

All representations, stipulations and conditions of approval stated in the Form 2A for this location shall constitute representations, stipulations and conditions of approval for this Form 2 Permit-to-Drill and are enforceable to the same extent as all other representations, stipulations and conditions of approval stated in this Permit-to-Drill.

#### Deep Fresh Water Aquifer Concerns

Area residents, county officials and other water resources stakeholders have reasonably demonstrated and expressed concern for and the likelihood of exposure deep fresh water aquifers while drilling this prospect. Conditions of permit

approval will reflect those demonstrated concerns. Deviations from the conditions of approval must have substantial proof to support them and must be approved by any one of the following COGCC personnel:

Regional Engineer (Mark Weems)  
Supervising Engineer (David Andrews)  
Engineering Manager (Stuart Ellsworth).

#### Highlights/Components to Engineering Conditions of Permit Approval (COA's)

1. Notices
2. Surface casing set @ 1200' and cement to surface. Deepest fresh water well within 1 mi radius=884'
3. Report surface casing cement pumping pressure prior to bumping the plug, cement volume, density, & yield
4. Formation Integrity test 50' below surface casing shoe
5. Bottom hole pore pressure design condition= 0.520 psi/ft
6. Casing change scenarios
7. Casing cementing scenarios
8. Cement bond or cement evaluation logs
9. Temperature survey
10. Resistivity logs
11. Porosity logs
12. Drilling mud reserve volumes on hand
13. Empty tank/pit reserve capacity for well mud discharges
14. Dry hole plug and abandon design and procedure

#### ENGINEERING CONDITIONS OF PERMIT APPROVAL (COA's)

##### COGCC CONTACTS:

Engineer – Mark Weems  
970-259-4587 off  
970-749-0624 cell  
mark.weems@state.co.us

Inspector – Steve Labowskie  
970-259-0945 off  
970-946-5073  
steve.labowskie@state.co.us

Provide contacts with seventy-two (72) hour notice of spud & include:

Operator Name  
Well Name and Number  
API #  
Legal Location  
Spud Date  
Name of rig supervisor  
Phone number of rig supervisor  
Email address of rig supervisor

Also and in addition to, provide the COGCC-Denver a 48 hour notice of spud via form 42

Provide COGCC contacts with:

Daily drilling reports & Pason/Drilling parameters or equivalent data  
At least three (3) hours notice of BOP test and casing seating depths

#### Casing Design & Implementation

##### Surface Casing

The surface casing being set at 1200' and cemented to surface is deemed adequate. The deepest water well within a mile radius is 884 feet deep.

While cementing surface casing, report surface pumping pressures near the conclusion of the job or just prior to bumping the plug at the float collar. Report cement volume (cu ft), cement density (ppg) and cement yield (cu ft/sk). If top cementing is required, report cement data on daily drill report. In all cases submit cementing contractor's job summary with form 5- Drilling and Completion Report.

Perform formation integrity test (FIT) to 10 ppg mud equivalent after drilling 50' of formation below surf csg shoe.

Assumed bottom hole pore pressure is 0.52 psi/ft or 4680 psi.

**Example:**

Surface casing set @ 1200'; well drilled out 50' from surface casing shoe; mud weight = 8.33 ppg or .433 psig/ft; surface test pressure =  $0.052(10.0 \text{ ppg} - 8.33 \text{ ppg})(1250') = 109 \text{ psi}$

Discuss calculations & test with COGCC engineer prior to test. Results must be noted on daily reports. Pressure losses exceeding 15 percent after 15 minutes will require remedial wellbore sealing and retest or running and cementing intermediate casing to surface (1st consult w/ COGCC SW Regional Engineer).

**Subsequent Casing Strings**

**Tentative Intermediate Casing**

The need may arise to run intermediate casing; so, operator must have the capability of running alternate casing and on location within 24 hours. Provide COGCC contacts with the name and phone numbers of the casing supplier having at least 5000' of 7" O.D. casing and 4200 feet of 4 ½" O. D. casing on hand.

Criteria for to run intermediate casing shall include but not be limited to the following:

A failed formation integrity test after drilling out 50 feet from the surface casing shoe

A cement pill (plug) or equivalent is used to seal a mud thief zone at depths between 4500'- 1200'

The minimal clearance allowed between the outside of the widest part of the casing (collar) and the inside of the next casing (inside drift) or wellbore & hole must be no less than 0.42 inches when measured on any radius from the center of the casing.

Any intermediate casing run and in all cases where intermediate casing is run, the intermediate casing will extend to surface and be cemented to surface. While cementing intermediate casing, report surface pumping pressures near the conclusion of the job or just prior to bumping the plug at the float collar. Report cement volume (cu ft), density (ppg) and yield (cu ft/sk) and bbls of cement circulated to pit. Submit a copy of the cementing contractor's job summary. Intermediate casing must have a temperature survey run within 8- 24 hours of cementing even if cement circulates to surface. A cement bond log (CBL) may be substituted in place of a temperature log. Submit two copies to COGCC-Denver (see rule 308A).

If intermediate casing is run, then the 4 ½" casing may be a liner (casing not run to surface) and must overlap the intermediate casing shoe by a minimum of 200 feet. The liner must be cemented from top to bottom.

A cement bond log is required on both the 4 ½" liner and 7" intermediate casing and must be run from the 4 ½" liner casing shoe, into the 7" intermediate casing and onto surface. Submit two (2) copies to the COGCC-Denver (see rule 308A).

In the event the operator chooses to run the production casing to surface in addition to intermediate casing, then the operator must run a temperature survey on the intermediate casing within 8-24 hours of cementing the intermediate casing to surface. A cement bond log may be substituted. Cement behind the production casing must overlap the intermediate casing shoe by a minimum of 200 feet. A cement bond log (CBL) is required to be run on the production casing.

**Production Casing and No Intermediate Casing**

Note: The COGCC revised the submitted APD and casing design to where the production casing will be extended to surface and cemented to surface. A cementing DV stage tool or external packers are recommended on the production casing cement job if no intermediate casing is installed. If the cement top on the production casing does not circulate to surface and remain at surface, then remedial cement work will be assessed and decided upon. Report the cement pumping pressures at the conclusion of the job or just prior to bumping the plug on the float collar. Report cement volume (cu ft), density (ppg) and yield (cu ft/sk) and the bbls of cement to pit. Submit one (1) copy of the cementing contractor's job summary. Submit two (2) copies of the cement bond log (CBL) (see rule 308A).

**Additional Conditions of Permit Approval - Logging**

Run temp survey 8-24 hours after cementing intermediate casing. Temperature survey is mandatory on intermediate casing and may be substituted with a cement evaluation log. Submit two (2) copies to COGCC-Denver (see rule 308A).

Run resistivity logs from MTD to base of intermediate casing; otherwise, to the base of the surface casing if no intermediate casing is run. Submit two (2) copies to COGCC-Denver (see rule 308A).

Run porosity logs from MTD to surface. Submit two (2) copies to COGCC-Denver (see rule 308A).

**Additional Conditions of Permit Approval - Mud Program**

Mud losses exceeding 20 bbls in any one incident must be noted on daily reports

In addition to mud used during drilling operator to have a minimal additional 600 bbls of mixed mud reserve in tanks and

on location ready to go in a moment's notice.

A minimal of 600 bbls of water reserve in tanks and on location w/ dry mud materials and additives on hand ready for mixing up 600 bbls of additional mud reserve

If the well is drilled without an earthen reserve pit, then have enough empty tanks on site to hold 600 bbls of mud.

Have dirt contractor located and available to dig a pit if well kick is likely to exceed 600 bbls of tank empty tank capacity on location.

#### Additional Conditions of Permit Approval - CEMENT ASSESSMENT

##### Scenario 1

Casing and cement as per approved APD (surface casing + production casing run & cemented to surface)

Run radial CBL or cement evaluation tool capable of identifying cement channels from MTD to surface on the production casing.

##### Scenario 2

7" intermediate casing and 4 ½" production casing (liner); the 4 ½" liner must overlap the intermediate casing a minimum of 200 feet

Run radial CBL or cement evaluation tool on both the 7" casing and the 4 ½" liner capable of identifying cement channels from MTD to surface

##### Scenario 3

Intermediate & production casing to surf

Run temp survey on intermediate casing and radial CBL on production casing

For all and any other Scenarios

Report Braden head pressure 24 hrs after cementing next casing string and again prior to perforating pay zone

Submit copy of all logs run to COGCC Denver office

Submit copy of cementing contractor's job log to COGCC Denver office for all casings

#### Dry Hole – Plug and Abandonment Procedure

100' cement plug above T/Entrada & tag

100' cement plug above T/Dakota & tag

100' cement plug above T/Mancos & tag

100' cmt plug above each zone with hydrocarbon shows & tag

100' cmt plug above any water flows & tag

100' cmt plug 50' below surf casing shoe & tag (perforate & squeeze if intermed or prod csg is present)

100' cmt plug 550'-450' tag unnecessary if csg press tests ok

50' surf cmt plug

Cut casing off 4' below grade and install PA marker (above or below ground-check with landowner)

PA maker to include, operator name, well name & number, legal location, API #, date plugged

### Attachment Check List

Att Doc Num	Name
1293008	CORRESPONDENCE
1857245	SELECTED ITEMS REPORT
400266057	FORM 2 SUBMITTED
400266085	30 DAY NOTICE LETTER
400266088	PLAT
400266091	TOPO MAP

Total Attach: 6 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Final Review	Operator incorrectly states that "Jynnifer # 1 (05-105-06003) and was PA'd 7/29/1988". P&A'd well was re-entered in 1991 and 1994. Well was plugged by COGCC in 2012.	10/4/2012 5:29:50 PM

Permit	Off hold - operator provided Individual Plugging Bond # 20120093 ; entered number on application.	10/4/2012 4:32:09 PM
Permit	ON HOLD for additional financial assurance	9/24/2012 3:55:28 PM
Permit	ON HOLD pending final evaluation	7/3/2012 12:03:00 PM
Agency	<p>COMMENT NO. 1</p> <p>San Luis Valley Ecosystem Council informed COGCC of difficulty using website to post the following comment on 4/27/12. COGCC agreed to post the following comment on 4/30/12 due to technical difficulties encountered.</p> <p>Colorado Oil and Gas Conservation Commission 1120 Lincoln Street, Suite 801 Denver, Colorado 80203</p> <p>RE: FIRST LIBERTY ENERGY INC10406 400266057</p> <p>To Mark Weems, Bill Yokely, Thom Kerr, Karen Spray, Jane Stanczyk and Steve Freese;</p> <p>We fully support Rio Grande County Commissioners and LGD Rose Vanderpool request to "delay any action or approval" for First Liberty 400266057 and Hughes 400266092 and any future applications in Rio Grande County until a proposed in-depth study of the Conejos formation geology and hydrology can be conducted. The proposed "San Luis Valley (SLV) Aquifer Study/Rio Grande County Investigation" will provide "deliverables to Rio Grande County" so that scientific data can be used to "make informed decisions concerning potential oil and gas development."</p> <p>Reclamation and Water Quality Testing</p> <p>The First Liberty proposed location of the Basin 1 well is approximately 620 feet from the abandoned Old Jynnifer well. We understand that the site will now have the attention of a reclamation team arriving May 1st, 2012. We understand that water quality testing will be conducted before the well is capped and we request the following recommendations:</p> <p>In addition to BTEX testing, not just the Jynnifer well but nearby homes, springs and creeks within a 3-mile area, also test for Total Petroleum Hydrocarbons (TPH) and perhaps dissolved methane. We strongly recommend testing for major ions, especially sodium and chloride, and also to do TDS, pH, conductivity, and perhaps turbidity. Testing for minor and trace elements would also be beneficial since the site has been abandoned for over 20 years. Soil samples will need to be conducted around the unlined pit since it was left to dissipate into the atmosphere and absorbed into the ground. Tanks and the surrounding area need to be included in the soil testing. We do not know at this time if the groundwater has already been contaminated.</p> <p>The abandoned Jynnifer well needs an MIT (Mechanical Integrity Test), Braiden Head Pressure Test, including a Formation Integrity Test to determine if the cement bond is still holding. This abandoned well may also serve a future purpose for water study analysis regarding flow and direction at a 6,000 ft depth. SLVEC supports a Phase 1 and 2 water study analysis before any oil and gas permits are approved.</p> <p>Significant Recharge Area</p> <p>In 1998, Colorado House Bill 98-1011 was passed requesting that, due to insufficient knowledge, a confined aquifer study be conducted in the San Luis Valley: "Concerning the replacement of depletions from new withdrawals of groundwater division 3 that will affect the rate or direction of movement of groundwater in the confined aquifer, and, in connection therewith, authorizing the State Engineer to promulgate rules that optimize the use of the groundwater and provide alternative methods to prevent injury".</p> <p>In section (3) (a), the Water and Irrigation Act states that: "The hydrologic system in water division 3 and, in particular, the hydrology and geology of the shallow aquifer and confined aquifer systems and their relationship to surface streams in water division 3 are unique and are among the most complex in the state....there is currently insufficient comprehensive data and knowledge of the relationship between the surface streams and the confined aquifer system to permit</p>	4/30/2012 10:35:10 AM

	<p>a full understanding of the effect of groundwater withdrawals, affecting the confined aquifer upon the natural stream and aquifer systems in water division 3....(b)1.. [rules promulgated by the State Engineer]shall be based upon specific study of the confined aquifer system and shall be promulgated prior to July 1, 2001...the State Engineer and the Colorado Water Conservation Board shall proceed with diligence to complete needed studies”.</p> <p>This act is important for two reasons:  1) It underscores the complex and poorly understood nature of the regions hydrogeology, even of the relatively shallow unconfined and confined aquifers and;  2) It addresses the need for further studies in order to better understand and inform water-related policy.</p> <p>Casing  Allen Davey, an Engineer with Davis Engineering located in Alamosa Colorado, pointed out at a public forum held in Rio Grande County on January 26, 2011, (attended by COGCC staff) that the Hughes application along San Francisco Creek is located in the Conejos Formation. The First Liberty application is located nearby. He talked about the unique hydrology of the San Luis Valley and its multiple aquifers. Mr. Davey suggested that cement casing be required to 3,000-4,000 feet or more.” (Please see US Fish and Wildlife Service 43 terms and conditions for the Baca National Wildlife Refuge, Lexam Explorations, complexity of aquifer and casing is explained there. Bottom of Pg. 5)  <a href="http://www.fws.gov/alamosa/baca/Baca_EA_Final_03.31.11_Dec%20Docs.pdf">http://www.fws.gov/alamosa/baca/Baca_EA_Final_03.31.11_Dec%20Docs.pdf</a>  It should also be noted that because this area may have geothermal water and corrosive minerals at this depth that a specific formula of cement may need to be used to ensure the integrity of the casing.  Thanks for your time and consideration in this matter.  Sincerely,  Christine Canaly, Director</p>		
Public	<p>COMMENT NO. 2</p> <p>I support the decision made by Rio Grande County Commissioners' request to delay approval of the First Liberty Application until an indepth study of the geology and hydrology in the county can be conducted. Additionally, nearby homes and water sources should be tested for any contamination from the abandoned site.</p>	4/27/2012 8:52:03 PM	
Public	<p>COMMENT NO. 3</p> <p>To Mark Weems, Bill Yokely, Thom Kerr, Karen Spray, Jane Stanczyk and Steve Freese;</p> <p>We fully support Rio Grande County Commissioners and LGD Rose Vanderpool request to “delay any action or approval” for First Liberty 400266057 and Hughes 400266092 and any future applications in Rio Grande County until a proposed in-depth study of the Conejos formation geology and hydrology can be conducted.The proposed “San Luis Valley (SLV) Aquifer Study/Rio Grande County Investigation” will provide “deliverables to Rio Grande County” so that scientific data can be used to “make informed decisions concerning potential oil and gas development.”</p> <p>Reclamation and Water Quality Testing</p> <p>The First Liberty proposed location of the Basin 1 well is approximately 620 feet from the abandoned Old Jynnifer well. We understand that the site will now have the attention of a reclamation team arriving May 1st, 2012. We understand that water quality testing will be conducted before the well is capped and we request the following recommendations:</p> <p>In addition to BTEX testing, not just the Jynnifer well but nearby homes, springs and creeks within a 3-mile area, also test for Total Petroleum Hydrocarbons (TPH) and perhaps dissolved methane. We strongly recommend testing for major ions, especially sodium and chloride, and also to do TDS, pH, conductivity, and perhaps turbidity. Testing for minor and trace elements would also be beneficial since the site has been abandoned for over 20 years.Soil samples will need to be conducted around the unlined pit since it was left to dissipate into the atmosphere and</p>	4/27/2012 4:07:56 PM	

absorbed into the ground. Tanks and the surrounding area need to be included in the soil testing. We do not know at this time if the groundwater has already been contaminated.

The abandoned Jynnifer well needs an MIT (Mechanical Integrity Test), Braiden Head Pressure Test, including a Formation Integrity Test to determine if the cement bond is still holding. This abandoned well may also serve a future purpose for water study analysis regarding flow and direction at a 6,000 ft depth.

SLVEC supports a Phase 1 and 2 water study analysis before any oil and gas permits are approved.

#### Significant Recharge Area

In 1998, Colorado House Bill 98-1011 was passed requesting that, due to insufficient knowledge, a confined aquifer study be conducted in the San Luis Valley: "Concerning the replacement of depletions from new withdrawals of groundwater division 3 that will affect the rate or direction of movement of groundwater in the confined aquifer, and, in connection therewith, authorizing the State Engineer to promulgate rules that optimize the use of the groundwater and provide alternative methods to prevent injury".

In section (3) (a), the Water and Irrigation Act states that: "The hydrologic system in water division 3 and, in particular, the hydrology and geology of the shallow aquifer and confined aquifer systems and their relationship to surface streams in water division 3 are unique and are among the most complex in the state....there is currently insufficient comprehensive data and knowledge of the relationship between the surface streams and the confined aquifer system to permit a full understanding of the effect of groundwater withdrawals, affecting the confined aquifer upon the natural stream and aquifer systems in water division 3....(b)1.. [rules promulgated by the State Engineer] shall be based upon specific study of the confined aquifer system and shall be promulgated prior to July 1, 2001...the State Engineer and the Colorado Water Conservation Board shall proceed with diligence to complete needed studies".

This act is important for two reasons:

- 1) It underscores the complex and poorly understood nature of the regions hydrogeology, even of the relatively shallow unconfined and confined aquifers and;
- 2) It addresses the need for further studies in order to better understand and inform water-related policy.

#### Casing

Allen Davey, an Engineer with Davis Engineering located in Alamosa Colorado, pointed out at a public forum held in Rio Grande County on January 26, 2011, (attended by COGCC staff) that the Hughes application along San Francisco Creek is located in the Conejos Formation. The First Liberty application is located nearby. He talked about the unique hydrology of the San Luis Valley and its multiple aquifers. Mr. Davey suggested that cement casing be required to 3,000-4,000 feet or more." (Please see US Fish and Wildlife Service 43 terms and conditions for the Baca National Wildlife Refuge, Lexam Explorations, complexity of aquifer and casing is explained there. Bottom of Pg. 5)  
[http://www.fws.gov/alamosa/baca/Baca\\_EA\\_Final\\_03.31.11\\_Dec%20Docs.pdf](http://www.fws.gov/alamosa/baca/Baca_EA_Final_03.31.11_Dec%20Docs.pdf)

It should also be noted that because this area may have geothermal water and corrosive minerals at this depth that a specific formula of cement may need to be used to ensure the integrity of the casing.

Thanks for your time and consideration in this matter.

Sincerely,

Christine Canaly, Director



Public	<p>COMMENT NO. 4</p> <p>We would like to comment on the proposal to permit this drilling.</p> <p>Our main concern is water; the possible contamination of ground water and the use of existing water in a drought stricken area which is dependent upon water for agriculture! It is ludicrous to think that we would use a valuable resource to deplete and pollute that same resource.</p> <p>The San Luis Valley is one of the last places in the State of Colorado to enjoy clean air. That very thing is what makes this a viable place for solar energy to shine. Fouling the skies with the attendant diesel exhaust from drilling, truck exhaust, dust from excessive heavy truck traffic on dirt roads, evaporation of fracking fluids and venting of gasses from a well - just doesn't make any sense. Clean skies are our future. Don't foul it up.</p> <p>If the existing/abandoned Jynnifer well is any example - we don't need more! Please find a way to clean up the existing mess and refrain from creating another.</p> <p>Sincerely,</p> <p>Randi Terry Young PO Box South Fork, CO 81154</p>	<p>4/27/2012 3:11:18 PM</p>
Public	<p>COMMENT NO. 5</p> <p>As neighbors of the proposed drilling site, we oppose granting of the application on the following grounds:</p> <ul style="list-style-type: none"> <li>- Grave concern about the quality and quatity of the water in our well.</li> <li>- Fear of negative influence on the property values in the area.</li> <li>- Past performance at the site, i.e. lack of clean up, etc., does not preclude confidence in any drilling efforts performed in the future, nor adherence to legal requirements.</li> <li>- Industrial traffic on the surrounding gravel roads will add to air pollution and create increaased maintenance by the County (therefore increasing our taxes).</li> <li>- As animal lovers who enjoy seeing the pronghorn and other wildlife come through our property, any drilling will cause them to seek other grazing land.</li> </ul>	<p>4/26/2012 1:29:50 PM</p>

Public	<p>COMMENT NO. 6</p> <p>To: COGCC Mike King and staff</p> <p>From: Rio Grande County Board of County Commissioners/LGD Rose Vanderpool</p> <p>Rio Grande County hereby requests that COGCC delay any action or approval for the above referenced application. Rio Grande County is in the process of conducting an in depth study of the geology and hydrology of the county, we have named San Luis Valley (SLV) Aquifer Study/Rio Grande County Investigation. The scope of work in the study will hopefully provide deliverables to help Rio Grande County use scientific data to make informed decisions concerning potential oil and gas development in our county. However, following are other concerns we have in reference to the Application Form 2/2A as presented:</p> <p>The proposed location of the Basin 1 Well is approximately 620 from the Jynnifer Well, it is disturbing that the COGCC has not reclaimed this site in a timely manner, which has left Rio Grande County perplexed as to the integrity of the COGCC to follow through with their own regulations and protect the citizens of Rio Grande County. It has only been in the last few days that COGCC has indicated that the site will be reclaimed. The Jynnifer Well needs to be reclaimed by de-mobilizing the tanks and capping/cementing the hole. However, we also urge that that a complete Mechanical Interity Test including pressure testing; BTX testing, and a fluid test also be completed before the well is capped and cemented. For your information, there has been recent activity of some sort at this site, and it is very evident that seepage of an unknown substance throughout the years (15-20) has been ongoing and is a grave concern. It might be wise to also complete a Phase 1, at a minimum, and possibly a Phase II Enviromental Analysis of the area.</p> <p>Page 4of4 - BMP- First Liberty states that closed loop system will be used when/if available. Per the Rio Grande County Oil Gas Regulations Addendum; Article XII. (pg 27); (8.8.6.1.) Only closed loop (pitless) drilling systems shall be permitted by Rio Grande County. Rio Grande County urges that COGCC requires closed loop systems for all Oil and Gas Operators (throughout Colorado) to further protect the SLV aquifers and not leave it up to the company/operators to tell us what they will do if available. It is not up to them. IF these Oil and Gas Companies want to operate in our county then they will follow all regulations from the beginning to the end. Rio Grande also urges the COGCC to require, from the start, baseline water quality testing for all water sources. The Oil and Gas Operation shall not cause degradation in the quality or quantity of surface waters from the addition of non-point source pollution. (Article XII, Addendum (pg. 23),(8.8.1.1.) A comprehensive study of the Conejos Formation/aquifer and all water conduits in the SLV should be done before any new drilling occurs in Rio Grande County. The San Luis Valley is unique, and should be acknowledged in setting high standard practices (BMP) to protect the citizens who live here.</p> <p>Form 2A-This location may not be considered high density, but in a rural community the impact of this type of industry is very impeding to the ways of life here in the San Luis Valley. The household wells that serve the residents near the proposed location, whether its a ¼ mile, ½ mile or 5 miles The QUALITY and QUANTITY OF OUR WATER NEEDS TO BE PROTECTED! The health, safety, and welfare of the citizens in Colorado as a whole should be the number one priority in enforcing the strictest regulations and/or supporting Rio Grande County Regulations; not only should the water be protected but the consumptive use these residents are accustomed to should not be impacted/diminished. If it is, what can be done to replace it? Probably nothing, so would that be considered a taking How do we get it back?</p> <p>Respectfully, we urge the COGCC to support Rio Grande County, as we move forward in the San Luis valley (SLV) Aquifer Study - Rio Grande County Investigation and strongly request that you extend the process (table) a decision for the above referenced, and the Dan A Hughes application and any future applicatons, until this study is completed.</p> <p>Thank you for consideration,</p>	<p>4/26/2012 1:03:56 PM</p>	
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Public	<p>COMMENT NO. 7</p> <p>One would surmise that in view of the critical nature of attempting to drill a hole through a water aquifer one would take every precaution to do it right. If the precise depth and location of the aquifer is in question then perhaps logic tells us to find out more about these important facts before drilling commences. Mark Weems, the COGCC Engineer in charge of this permit seemed to agree when videotaped in front of a group of concerned citizens but when the spotlight is turned off his actions are contrary to good engineering practice.</p> <p>Mr. Weems promised to investigate the depth of the aquifer before drilling began but yet has failed to deliver on his promise. On the Application for Permit, cement is designated to a depth of 1200 feet when more like 4050 feet would be the requirement for an aquifer at a 4000 foot location.</p> <p>This borders on criminal negligence.</p> <p>Are the folks at COGCC willing to bear this responsibility? If not then we ask for a geologic study and a re-evaluation of these engineering decisions.</p> <p>Sincerely,KD Bellar719 580 1838</p>	<p>4/26/2012 8:12:33 AM</p>
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Public	<p>COMMENT NO. 8</p> <p>To: Members of the Permitting Review Staff</p> <p>We wish to submit urgent concerns regarding the APD (Document Number 400266057) filed for Rio Grande County, which is currently under your consideration. There are significant factors associated with potential fossil fuel development on this site that raise serious concerns of risks to public health and safety and the environment in the surrounding area. The proposed exploration site lies in close proximity to the Jynniifer well drilled in 1985. That well was abandoned without clean up or reclamation.</p> <p>For the following reasons, we feel that granting a drilling permit in this location is unwise and unwarranted:</p> <ul style="list-style-type: none"> <li>*An unsecured wellhead remains at the site</li> <li>*There are 3 unsecured tanks on the site containing and leaking crude oil</li> <li>* Soil surrounding the drill site is contaminated by petrochemical components and drilling products</li> <li>*An open unlined pit is located at the site</li> <li>*There is no fencing securing this former drill site</li> <li>*There is no signage posted to warn of the dangers of the open pit, contents remaining in the abandoned tanks, or spilled petroleum products contaminating the surface.</li> </ul> <p>Untold damage has been done to the environment in and around the drilling site. All of the conditions stated above are in violation of current COGCC regulations and, MOST IMPORTANTLY, the extent to which surface and ground waters have been polluted has not been studied or documented. If seepage from the old well has penetrated into the ground water, there is the grave possibility that the Conejos Aquifer has been polluted. This possibility of contamination should be investigated with the most intensive diligence and testing to insure that this critical water source is safe and unsullied. This should be done prior to issuance of a permit for any exploratory activity at this site. It is also imperative that testing be done 1.) of the mechanical integrity of the abandoned well components; 2.) at the site for soil and water contamination and 3.) of the water quality of wells of residents living within a wider radius of the abandoned site.</p> <p>The COGCC has known for several years ago of the conditions at this abandoned site. No action has been taken to enact clean up and no individual or parties have been held accountable for the environmental damage or its remediation. This is unacceptable for an agency charged with ensuring good drilling practices and assuring the safety of humans, wildlife and environment at all sites subjected to mineral exploitation. Long before any new drilling can take place, the former drilling site must be cleaned up to meet current best management practices and good water quality, protected.</p> <p>We urge that as you review this APD, you give thoughtful and extended consideration to the issues raised above and acknowledge the inappropriateness of any energy exploration proposed at this site. Honor the health, safety and well being of the residents along the Old Woman's Creek and in greater Rio Grande County, as well as the vulnerability of the surrounding fragile environment, by denying the current request to drill. It would be unconscionable to do otherwise.</p> <p>Thank you for your careful attention to these comments.</p>	<p>4/25/2012 2:51:44 PM</p>
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Public	<p>COMMENT NO. 9</p> <p>With the San Luis Valley being a High Mountain Desert, WATER is very important to the San Luis Valley for agricultural and recreational puposes.WE CANNOT afford the contamination that fracking causes, our community will suffer. The State should require a water study at each proposed site and the permit placed on hold until the study is complete. Not only should environmental studies be completed before a permit is released, but a Health Impact Assessment should also be completed to assess the impacts of increased traffic in the area, strain on health services, and increased exposure to danergous chemicals. The state of Alaska requires all of these assessments to be completed before a permit to drill is given, why can't COLOADO have high standards also??? We need to protect our land, water and people. Are we so willing to give up the beauty of Colorado for a few barrels of oil/natural gas? It is time to take a stand and protect our selves! Please designate the San Luis Valley as a NO DRILLING ZONE!!!</p>	<p>4/24/2012 8:44:51 PM</p>
Public	<p>COMMENT NO. 10</p> <p>As residents of State of Colorado and Rio Grande County, we believe that COGCC has a duty to enforce it;s existing regulations regarding the testing and clean up of existing wells before putting local citizens at risk with approval of permit applications for new wells.Specifically the New Liberty Energy Inc application should be denied untill the adjacent old Jynnifer well, of which you are aware recieves it's legally overdue Mechanical Integrity Test, and the site cleaned up. We also believe that the Conejos Aquifer be tested for contamination. As oil and gas development comes to Rio Grande county it is imperative that we set the highest standards for protection of ground water.</p>	<p>4/22/2012 5:49:51 PM</p>
Public	<p>COMMENT NO. 11</p> <p>The Basin #1 site has three tanks, about 10,000 gal. each I believe, that presently contain an estimated 5000-6000 gallons of an unknown liquid. The tanks are leaking at some unknow rate and this leakage presents an unknown health and safety hazzard to the public. Since any contamination of groundwater or existing wells in the area are possible due to this leakage, a survey and BTX well testing, funded by the operator, must be completed before additional drilling is permitted, per 8.8.1.7.</p> <p>A pad liner must be installed per 8.8.1.5 and secondary containment must be provided around the tanks, per 8.8.5.5.</p> <p>A complaint has been filed with Rio Grande County, pertaining to these tanks as a violation of their Blight Ordinance and as a violation of the Code for the Abatement of Dangerous Buildings as the tanks fall under the definition of a structure according to this ordinance.</p> <p>It is reprehensible that the COGCC has approved this permit without a complete understanding of these issues.</p>	<p>4/18/2012 11:25:08 AM</p>
Public	<p>COMMENT NO. 12</p> <p>Please consider our other more earth friendly options of retaining energy. Options such as solar panels, more insulated homes and products that don't involve the usage of plastics and oil. Please don't indulge in drilling in the San Luis Valley.</p> <p>Thank You.</p>	<p>4/16/2012 4:36:57 PM</p>

Public	<p>COMMENT NO. 13</p> <p>The Jynnifer Mosley Well has never been cleaned up. The people of Rio Grande County and the entire San Luis Valley need to have this well tested as it may have been polluting our water for the past 20 years. I am requesting that a BTX water well test be done, at the oil company's expense. The owner, not the state or the citizens, needs to have a Mechanical Integrity Test performed on the Jynnifer Well before it is plugged.</p> <p>These actions are needed BEFORE a new permit to drill is given. We MUST protect the water. Water is the life-blood of the San Luis Valley and all down river who depend on water coming from our Valley.</p>	<p>4/13/2012 10:11:24 AM</p>
Public	<p>COMMENT NO. 14</p> <p>COGCC, Thank you for an opportunity to directly address you on the permit application at hand for thr Rio Grand County.</p> <p>Mr Mosley, First Liberty Energy INC (as noted; NOT from COLORADO, Therefore not of the Local people needing jobs), Govenor Hickenlooper, COGCC, and last but not least Mr. Weems, I will supply you with the definition of the word INTEGRITY in which this comment will be based upon.</p> <p>INTEGRITY definition- State or quality of being complete, undivided, or unbroken; entirety. Unimpaired state, soundness; purity. MORAL soundness; honesty; uprightness.</p> <p>As another application to drill in the Rio Grande County is now in process the very foundation as to why this drill should not be allowed a permit, will be given from grounds of unacceptable behavior.</p> <p>Year 2011, COGCC representatives spoke to the Commissioners and the concerned people of the Rio Grande County, as to the process in which the COGCC and a drill for OG was applied for, how the permitting process worked and then explained the reclamation of the land back to its natural status once a drill was complete and abandoned. As said, to always be done by COGCC REGS.</p> <p>As stated very clearly by another comment, there was a speaker from the area at this meeting, that explained the need to have a Study done for this area due to the Conejos formation, and clearly the concern for the water tributaries to the main water sorce of the San Luis Valley.</p> <p>Mr. Weems, you agreed to speak with this gentleman during the meeting prior to any drill pass by you, and then as the last application was placed for the Huges drill in the San Francisco Creek Ranch Subdivision, I spoke personally with you about you making this contact. You said it was on my list of things to do, yet in a matter of a a couple days you passed your part of the process.</p> <p>The great problem with these comment opportunities is without HEARINGS we as the people recieve NO answers as to, WHAT YOU ARE DOING... and if you followed through with what you said you would do.</p> <p>Hearings for any drill in the Rio grande County is asked for.</p> <p>Our phone conversation also intailed the fact that if you said all drills are capped and returned to the original status, the natural look, referring directly by name the OLD JENNIFER WELL, you said to me, that that was a problem for this well, and it had never been completed because it was not cost effecient.</p> <p>The COGCC from all records, signed by you, Mr Weems, could not make its mind up if this well was satisfactory or not as to its last process to leave in its original natural state.</p> <p>Is this Ethical? AND WE THE PEOPLE ARE SUPPOSE TO BE OK WITH THIS TYPE OF WORK ETHIC?</p>	<p>4/12/2012 3:56:30 PM</p>

Absolutly NOT.  
Where is the INTEGRITY?

There has never been a Mechanical INTEGRITY Test done, and this owner has the audacity to apply for a permit? Saying he paid the COGCC to complete and never making sure the completion was done is of extreme concern to the citizens surrounding a sensitive area for the Water there.

Every person in the area must have their well tested by Mosely, COGCC, to make sure there has not already been contamination from such lack of following the COGCC REGS and done for future baseline testing, to be able to be held up in a 'COURT of LAW ' .

Karen Spray has aquired a list of residents from the San Fracisco Creek Ranch Subdivision for well testing for each residential well, the Western land Services Application in Best Management Use, has stated that the wells are to have baseline testing done. This MUST also be the case For the application process here and residents should not have to fight for this but instead from the INTEGRITY of the owner of the drill and the COGCC, it should just be done.

So this leads to the integrity or lack thereof from;

- The men involved in approving applications.
- The organization making decisions, in the process.
- An owner of the FEE Titled Property, MR. Mosley, in conjunction as a neighbor to those he has put in possible jeopardy already, from a non-completed, for decades, left to no scrutiny by him or the EPA or the COGCC in completing a drill, for HIS, OIL AND GAS SITE drill.

The amount of citizens that are getting very weary of the inability of those in the Oil And Gas Industry, to do what is upright, honest and sound, is on the rise. Legislation has already given a pass on the laws that expect this Industry to do as any other common citizen must abide by in the work force, but does a man not re-evaluate his own character and integrity to keep himself in check. What has happened to Moral Uprightness of ones own self and not the need to have others express the obvious?

Just to return to a value of the Golden Rule and the common sense that once ruled this Country would be a breath of fresh air. Instead the Industry is causing air pollution and saying they did not do it....

Air quality studies must be done prior to any drill in the Rio Grande County. Done by the drill owner and COGCC without having to battle for something so simple. Is not the Government in enough trouble from law suits due to the Industry polluting the air of citizens?

Where are the sites these drillers are taking their polluted mud and water too?

Why not just do right as if you are living with it in your backyard, in your house and with your family members being damaged by the negative affects this Industry has caused?

Knowing that with the draught issues of the last year and the fortelling of another worse year for water supply, why should this Industry be able to even have the chance to use such a valuable commodity.

We can live without OG, yet water is the life sorce for not only humans, and animal life for today, but who is protecting the future generations to come?

People of concern from the OG negatives, commit to not driving one day a week and pass the challenge on, giving no excuses for drilling to continue as is... the Industry may not only stop topping out the Natural Gas sorces of which there is not a huge place for in America, but the 'top dogs' may find a big bite out of their powerful pocketbooks!

From one concerned citizen, that you have not beaten down to just give in and say who cares, do whatever...

	<p>I am saying not now, NOT ever....NO CONTAMINATION !!!!</p> <p>Do not give a pass on this permit!</p>	
Public	<p>COMMENT NO. 15</p> <p>As a resident of the area who relies on well water I feel that the quality of our waters need to be protected. Before any more damage is done prior messed need to be contained and cleaned thouroughly. The proper assessments need to be completed before more damage is incurred on our great land. It would make more sense for renewable energy solutions to be brought forth.</p>	<p>4/10/2012 4:59:03 PM</p>
Public	<p>COMMENT NO. 16</p> <p>As a owner of property, just to the south of the proposed oil well site; I am concerned about the well water for my property. The well is a small artesian well. The water feeds out of the Twin Mountain area to the north and west. The issue is the possibility of water contamination and whether during the drilling process, there might be a change of the direction of the flow of the underground water. If my water well or any of the other water wells in the surrounding area goes dry during the drilling process of the proposed oil well; what then is the plan of action for the Colorado Oil and Gas Commission? Or does the Colorado Oil and Gas Commission not consider that possibily happening? Has the First Liberty Energy INC, taken in to consideration and studied the issue of the aquifer and the water wells in the area?</p>	<p>4/6/2012 3:23:21 PM</p>
Public	<p>COMMENT NO. 17</p> <p>According to the information on the COGCC site, an MIT needs to done on a shut in well every 2 years for water safety. Being that the old Jynniifer Well has never had the MIT done even after several request by the COGCC is a huge problem for the people of Rio Grande County. The Jynniifer Well is drilled right through the Conejos Aquifer, listed as volcanic on your notes, which means the aquifer might be contaminated for the last 20 years. The obvious oil spills from the three leaking tanks, and the unlined pits, that you know about, means the people in the area need a BTX water well test, not only for baseline for the new well, but also for the contamination from the Jynniifer Well. According to the COGCC notes, that I have recorded, L.G. Mosley expects the State Tax payers to clean up the site and fill in the oil saturated pits so that a small child or animal will not get trap in the polluted pits. This has not been done. The Mosley #1 Well was plugged using Bull heading Cement so even the wells that were plugged were done incorrectly according to your records. The Local geologist and Local Water engineer both agree that a study needs to be done on the Conejos Aquifer BEFORE any drilling takes place in Rio Grande County. Mark Weems has already signed off on the permit before any comments were submitted. I have him on video tape saying that he would consult with local water engineers before he would sign off on the Hughes permit, now he did the same on this permit. The Colorado Tax Payers pay your salaries, if you want to work for the oil and gas industry go ahead, but don't pretend like you have a concern for the people of Colorado that pay you, when you are just tools for the oil and gas industry. Anybody that wants to see what happened, go to the COGCC site go to Inspection/Incident,fill in 105 county code, fill in 06003 sequence code then read the notes. You can get to the same place with the GIS site then Zoom to city Del Norte and click on all the red dots for info on each well. The Jynniifer is in a cluster of 4 wells NW of Del Norte. Hurry up they may soon be gone.. And now the COGCC will give Mosley another permit,, just watch....</p>	<p>4/5/2012 8:56:47 PM</p>



Public	<p>According to the information on the COGCC site, an MIT needs to done on a shut in well every 2 years for water safety. Being that the old Jynnifer Well has never had the MIT done even after several request by the COGCC is a huge problem for the people of Rio Grande County. The Jynnifer Well is drilled right through the Conejos Aquifer, listed as volcanic on your notes, which means the aquifer might be contaminated for the last 20 years. The obvious oil spills from the three leaking tanks, and the unlined pits, that you know about, means the people in the area need a BTX water well test, not only for baseline for the new well, but also for the contamination from the Jynnifer Well. According to the COGCC notes, that I have recorded, L.G. Mosley expects the State Tax payers to clean up the site and fill in the oil saturated pits so that a small child or animal will not get trap in the polluted pits. This has not been done. The Mosley #1 Well was plugged using Bull heading Cement so even the wells that were plugged were done incorrectly according to your records. The Local geologist and Local Water engineer both agree that a study needs to be done on the Conejos Aquifer BEFORE any drilling takes place in Rio Grande County. Mark Weems has already signed off on the permit before any comments were submitted. I have him on video tape saying that he would consult with local water engineers before he would sign off on the Hughes permit, now he did the same on this permit. The Colorado Tax Payers pay your salaries, if you want to work for the oil and gas industry go ahead, but don't pretend like you have a concern for the people of Colorado that pay you, when you are just tools for the oil and gas industry. Anybody that wants to see what happened , go to the COGCC site go to Inspection/Incident, fill in 105 county code, fill in 06003 sequence code then read the notes. You can get to the same place with the GIS site then Zoom to city Del Norte and click on all the red dots for info on each well. The Jynnifer is in a cluster of 4 wells NW of Del Norte. Hurry up they may soon be gone.. And now the COGCC will give Mosley another permit,, just watch....</p>	4/5/2012 8:56:47 PM
Public	<p>COMMENT NO. 18</p> <p>As was previously stated the Jynnifer Mosley oil site was never cleaned up even after several inspections and warnings issued to Mr. Mosley by the COGCC. Mr. Mosley essentially ignored the state requirements and allowed his well to remain uncapped and without a well integrity test for decades in violation of state regulations and specific directives from the COGCC. Reserve pits were never cleaned up or covered and oil storage tanks were not drained allowing leakage onto the ground, again for decades. All of the efforts of the COGCC to get Mr. Mosley to take responsibility for the proper abandonment of the Jynnifer Mosley oil site were in vain and to this day no one, including the COGCC and the EPA has any idea if the ground surrounding the Jynnifer Mosley site and the underlying aquifer has been contaminated by these years of leakage, no tests have been done. No one has conducted water testing of adjacent domestic water supplies. All of these activities cost money. Mr. Mosley did not want to spend HIS money to comply with the state regulations and requirements for safeguarding public resources. Instead HE EXPECTED THE TAXPAYERS TO CLEAN UP HIS MESS. All of us pay for the activities of the COGCC and the EPA and when someone dumps the clean up of their exploratory "Wildcatting" activities on these agencies, we all pay dearly. Now he wants to "Wildcat" again. Why should we expect that he would behave any differently with this drilling activity than he did with the Jynnifer Mosley well? He got away with it before, why would he do anything differently now? He fooled the COGCC once, shame on him. Now is the COGCC going to let him fool them twice? Shame on you, COGCC! Don't let him do it. If you do both of you will be stealing from the taxpayers.</p>	4/5/2012 7:28:41 PM
Public	<p>COMMENT NO. 19</p> <p>We, as residents of the San Luis Valley, need to know that our water is protected. Please do not permit another drilling until a study of the aquifer is done and the prior drill site is mitigated. The Jenifer oil site abandoned in the 1980's is close to a water supply and has not been cleaned up. This corporate practice is not a beneficial precedence to set for anyone. Companies need to be held responsible to clean up after drilling and all profits are made.</p>	4/5/2012 9:42:15 AM

Public	We, as residents of the San Luis Valley, need to know that our water is protected. Please do not permit another drilling until a study of the aquifer is done and the prior drill site is mitigated. The Jennifer oil site abandoned in the 1980's is close to a water supply and has not been cleaned up. This corporate practice is not a beneficial precedence to set for anyone. Companies need to be held responsible to clean up after drilling and all profits are made.	4/5/2012 9:42:13 AM
Permit	Mancos, Dakota and Entrada are all covered under Rule 318 a. therefore the unit acrages and unit configurations were removed.	4/5/2012 9:33:04 AM
Public	Rio Grande Grande County requests an extentsion for public comment. Rio Grande County requests that acomplete study and mandatrory clean up of the Jennifer Mosley oil site be reclaimed before starting a new drill site. There a several artesianwells in close proximity of this site. Baseline water testing should be required at your end as well as a Health Impact Study. Rio Grande County LGD requests to be apart of the hearing process.	4/5/2012 7:51:08 AM
Permit	Operator corrected county. This form has passed completeness.	3/28/2012 2:50:52 PM
Permit	Returned to draft. Incorrect county.	3/28/2012 2:32:02 PM

Total: 29 comment(s)

## BMP

<u>Type</u>	<u>Comment</u>
Site Specific	<p>Fence the well site after drilling to restrict public and wildlife access.</p> <p>Keep well site location, the road, and the pipeline easement free of noxious weeds, litter and debris.</p> <p>Spray for noxious weeds, and implement dust control, as needed.</p> <p>Operator will not permit the release or discharge of any toxic or hazardous chemicals or wastes on Owner's Land.</p> <p>Construct and maintain gates where any roads used by operator, its employees, or contractors cross through fences on the leased premises.</p>
Drilling/Completion Operations	<p>When available and reasonable use a closed-loop drilling mud system to preclude the use of an earthen reserve pits when available.</p>
Planning	<p>When feasible develop multiple well sites by using directional drilling to reduce cumulative impacts and adverse impacts on wildlife resources.</p>
Construction	<p>Remove only the minimum amount of vegetation necessary for the construction of roads and facilities.</p> <p>Conserve topsoil during excavation and reuse as cover on disturbed areas to facilitate regrowth of vegetation.</p> <p>No construction or routine maintenance activities will be performed during periods when the soil is too wet to adequately support construction equipment.</p>
Storm Water/Erosion Control	<p>Use water bars, and other measures to prevent erosion and non-source pollution.</p> <p>Implement and maintain BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation.</p> <p>Co-locate gas and water gathering lines whenever feasible, and mitigate any erosion problems that arise due to the construction of any pipeline(s).</p>
Final Reclamation	<p>All surface restoration shall be accomplished to the satisfaction of Owner.</p> <p>All reseeding shall be done with grasses consistent with the Rocky Mountain native mix or other grasses reasonably requested by surface owner and during planting period suggested by Owner.</p> <p>Final reclamation shall be completed to the reasonable satisfaction of the Owner as soon as practical after installation (weather permitting) and in accordance with regulatory agency standards (BLM/COGCC).</p>
Interim Reclamation	<p>Utilize only such area around each producing well as is reasonably necessary.</p> <p>Restore the remainder of the well site location to its original condition within a reasonable time after the completion of operations.</p> <p>All reseeding shall be done with grasses consistent with the Rocky Mountain native mix or other grasses reasonably requested by surface owner and during planting period suggested by Owner.</p>

Total: 7 comment(s)