



State
of
Colorado

Noto - DNR, John <john.noto@state.co.us>

Incremental Oil and Gas LLC, Grouper #09-28 Well, Form 2A # 400368681 and Form 15 # 400373857

2 messages

Noto - DNR, John <john.noto@state.co.us>

Tue, Jan 29, 2013 at 5:01 PM

To: jpadilla@petro-fs.com

Cc: Peter Gintautas - DNR <peter.gintautas@state.co.us>

Julie,

The COGCC is reviewing the above-referenced Form 2A and Form 15. In order to complete our review process, we request that you address the following items:

1. The Form 15 indicates the pit type as Multi-Well, however, the Form 2A lists number of wells at 1. Please clarify the number of wells and with your approval, I will input that information on the forms.
2. Pit content disposal indicated on the Form 2A as Onsite-burial, and the Form 15 does not list off-site disposal. Please indicate pit content disposal for the Form 15 and Form 2A that is in accordance with COGCC rules if the drilling fluids are oily waste, and with your approval, I will input this information on the forms.
2. The pit construction date on the Form 15 is 01/08/2013, please provide a revised date and with your approval, I will update the Form 15.
3. The estimated date that interim reclamation will begin on the Form 2A is 3/3/2014. Please provide a revised date that is in accordance with COGCC rules and with your approval, I will update the Form 2A.
4. There was snow cover at the reference area when the submitted photos were taken. Please plan to submit new photos showing the reference area without snow cover in accordance the Rule 303. Per the rule, photos shall be taken during growing season and may be submitted up to 12 months after the Form 2A.

Conditions of Approval:

COGCC requests your concurrence on the following BMPs or COAs:

1. Drilling pit shall be constructed and managed in accordance with provisions detailed in Form 15, Earthen Pit Permit/Report (Doc ID 400373857). Pit shall not be constructed or operated prior to Form 15 approval.

Please respond in writing (e-mail) to this request. If you have any questions, please do not hesitate to contact me at 303-894-2100 extension 5168.

Thank you.

John Noto
Oil and Gas Location Assessment
Colorado Oil and Gas Conservation Commission

Julie Padilla <JPadilla@petro-fs.com>
To: "Noto - DNR, John" <john.noto@state.co.us>

Wed, Jan 30, 2013 at 8:26 AM

John,

1. The Form 15 indicates the pit type as Multi-Well, however, the Form 2A lists number of wells at 1. Please clarify the number of wells and with your approval, I will input that information on the forms. **This is not a multi-well pad; please uncheck the box.**
2. The pit construction date on the Form 15 is 01/08/2013, please provide a revised date and with your approval, I will update the Form 15. **Change the date to 2/8/2013**
2. Pit content disposal indicated on the Form 2A as Onsite-burial, however, the Form 15 lists disposal at a commercial facility. Please provide disposal information and with your approval, I will input this information on the forms.

Pit contents will be disposed using evaporation, burial and offsite disposal to an authorized commercial landfill per COGCC, Series 900 rules. During drilling operations, any excess amount of fluids will be disposed to an authorized local commercial landfill. Oil contaminated cuttings will be disposed to an authorized local commercial landfill. Upon closure of the pit, cuttings left in pit shall meet the standards listed in Table 910. Synthetic pit liners shall be removed and disposed per COGCC, Series 900 rules to an authorized local commercial landfill. Refer to Preliminary Pit Closure Plan below.

Change the Mud disposal: to Onsite, Disposal Facility Other: Burial, Liner Commercial Landfill

3. The estimated date that interim reclamation will begin on the Form 2A is 3/3/2014. Please provide a revised date that is in accordance with COGCC rules and with your approval, I will update the Form 2A. **Change the date to 9/1/2013**
4. There was snow cover at the reference area when the submitted photos were taken. Please plan to submit new photos showing the reference area without snow cover in accordance the Rule 303. Per the rule, photos

shall be taken during growing season and may be submitted up to 12 months after the Form 2A. **Will take new photos and submit before 12 months is up.**

Conditions of Approval:

COGCC requests your concurrence on the following BMPs or COAs: **Yes we concur with the COA's below.**

1. Drilling pit shall be constructed and managed in accordance with provisions detailed in Form 15, Earthen Pit Permit/Report (Doc ID 400373177). Pit shall not be constructed or operated prior to Form 15 approval.
2. "Operator will conduct initial baseline and follow-up groundwater testing in accordance with the provisions set forth by COGCC in Rule 609 as adopted on January 7, 2013. The rule can be found on the COGCC website: http://dnrdensterling/RR_HF2012/Groundwater/Groundwater.htm

Julie Padilla

Regulatory Manager

Petroleum Field Services LLC

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From: Noto - DNR, John [mailto:john.noto@state.co.us]

Sent: Tuesday, January 29, 2013 5:01 PM

To: Julie Padilla

Cc: Peter Gintautas - DNR

Subject: Incremental Oil and Gas LLC, Grouper #09-28 Well, Form 2A # 400368681 and Form 15 # 400373857

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