



Noto - DNR, John &lt;john.noto@state.co.us&gt;

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**KPCI LLC, Winters #2 Well, Form 2A # 2165599**

2 messages

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

Thu, Apr 4, 2013 at 9:15 AM

To: Dan Hall &lt;dan@energyop.com&gt;

Dan,

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

1. The construction layout drawing attached to the form shows both the pre-existing lined pit and a planned 25'x25'x8' pit. However, the Form 2A indicates only one drilling pit. Please indicate the planned use for both pits. I will update the facilities information to include the pit on the Form 2A with your approval.
2. Planned mud disposal is listed on the Form 2A as onsite - evaporation, please note that per COGCC Rule 905, the drilling mud left in place must be sampled and shall not exceed concentrations in Table 910-1 and liners shall be removed and disposed of. Pit closure and minimum cover requirements must be conducted in accordance with Rule 1003. Based on your additional information I will update the Form 2A with your approval.
3. The proposed location indicates one well on the location, however, the pad will include both the planned Winters #2 and the plugged and abandoned Winters #8-33-1 well. With your approval, I will update the number of wells on the Form 2A to 2 wells.
4. If either pit is intended to be left in place for the landowners use, a Rule 502.b. variance is required. The request for a variance for a variance from the 900-series rules (Rule 905 - pit closure) triggers a consultation with CDPHE on the Form 2A. Please indicate if this is your intention and COGCC will notify CDPHE of their requirement to consult.

COGCC requests your concurrence on the following COAs:

1. Liner in existing pit is torn and must be repaired and existing pit solids must be removed prior to use as a drilling pit for the Winters #2 well. If the existing pit solids are planned to be evaporated and buried on site, they must be sampled to verify that concentrations are below the thresholds in Table 910-1. If existing pit solids concentrations are below those in Table 910-1, they may be removed from the pit and staged in a secure area during drilling operations. Otherwise existing pit solids must be sent to a commercial solid waste disposal facility.
2. Operator is responsible for closure of existing drilling pit and contents. Pit closure plan detailing sampling program, liner disposition, and E&P waste handling procedures, shall be submitted to the Director within 30 days of approval of this Form 2A. Report of closure, including analytical results shall be submitted to Director within 45 days of closure activity."

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.

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John Noto, P.G.  
Oil and Gas Location Specialist  
Colorado Oil and Gas Conservation Commission  
(303) 894-2100 ext. 5168

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**Dan Hall** <dan@energyop.com>

Thu, Apr 4, 2013 at 2:30 PM

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

Cc: clive chapman <clive@kcpi.co.uk>, paul@kcpi.co.uk, David Braden <david@energyop.com>

Hi John,

The larger reserve pit has been previously constructed and the only new pit to be constructed is the 25'x25'x8' pit which will supplement the larger pit. Both pits will be used and lined. The existing cuttings in the larger pit will be sampled and tested. Assuming the analysis conforms with COGCC standards, we will then remove the cuttings for the existing pit, stockpile them on location, remove and dispose of the torn pit liner and reline the pit. Upon final reclamation, the cuttings will be re-inserted into the pit and covered with the already-stockpiled topsoil.

Mud disposal will be by evaporation. After the pit is dry, the contents will again be tested and (if conformable with COGCC standards) will be reburied and covered with topsoil.

The pad will contain two wellbores.

We understand that if the landowner wishes to use these pits, we will request a 502.b variance. My recommendation to KCPI, however, will be to reclaim both pits to COGCC standards, for liability purposes.

As per correspondence previously conveyed to the COGCC, KCPI is assuming the obligation to close and reclaim the existing pit that was constructed by OWTS. Realizing that we will be using the pit in drilling of the new well (Winters #2) it is requested that an extension to submitting a plan for reclamation be granted until the Winters #2 well is drilled and then a plan for reclamation can be submitted for both pits.

Please call if any further information is required. A copy of this is being sent to KCPI for their records.

Thanks,

Dan Hall

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

**Sent:** Thursday, April 04, 2013 9:15 AM

**To:** Dan Hall

**Subject:** KPCI LLC, Winters #2 Well, Form 2A # 2165599

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