

STATE OF
COLORADO

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

Caerus Piceance LLC, Mesa B12-797, 2A #400784806, Mesa E1-797, 2A #400730168

2 messages

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

Thu, Apr 30, 2015 at 4:50 PM

To: cventuro@progressivepcs.net

Cc: Dave Kubeczko - DNR <Dave.Kubeczko@state.co.us>, Diana Burn - DNR <diana.burn@state.co.us>

Crissy,

This email is a follow-up to our phone conversation today.

Please update the Waste Management Plan for each location to include these items;

- It is stated on the APDs that if cuttings meet Table 910-1 standards, they will be treated as soil, please provide brief description of how cuttings will be reused,
- Provide the anticipated volume of cuttings,
- Provide BMPs for maintaining cuttings stockpiles (erosion/runoff controls, berms, etc.)
- Plans to gather water via pipeline and trucks to the planned injection facility seems to be inconsistent with the plans for a UIC Well on the pad. Please clarify the plans for water injection and water sources.

COGCC will either reword or remove the following Drilling/Completions COA from the Form 2As,

Before hydraulic stimulation of the each well, operator shall collect a groundwater sample from the Ohio Creek Formation and analyze for total dissolved solids (TDS); submit laboratory analytical results to COGCC (emails: bob.koehler@state.co.us and arthur.koelspell@state.co.us).

This will be discussed with Caerus prior to approval of the 2As. Please feel free to call or email if you have questions or concerns.

Thank you,

John Noto

—

John Noto P.G.

Oil and Gas Location Assessment Supervisor

**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources

P 303.894-2100 ext 5182 | C 720.498-5298

1120 Lincoln Street, Suite 801, Denver, CO 80203

Crissy Ventura <cventura@progressivepcs.net>

Fri, May 1, 2015 at 2:21 PM

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

Cc: Dave Kubeczko - DNR <Dave.Kubeczko@state.co.us>, Diana Burn - DNR <diana.burn@state.co.us>, Shauna DeMattee <sdemattee@progressivepcs.net>

Hi John,

Thanks again for your help and explanation yesterday. Caerus' response to your concerns with the Mesa B12-797 and Mesa E1-797 locations are listed in blue below. Please let me know if you need additional information for the permits.

The following statements in blue have been added to the WMPs for both locations. Please see attachments for the revised plans.

- It is stated on the APDs that if cuttings meet Table 910-1 standards, they will be treated as soil, please provide brief description of how cuttings will be reused:
 - [Cuttings will be reused for filling in the cut slopes and pad reclamation.](#)
- [Provide the anticipated volume of cuttings,](#)
 - [Approximately plus or minus 15,000 cubic yards of cuttings are anticipated.](#)
- [Plans to gather water via pipeline and trucks to the planned injection facility seems to be inconsistent with the plans for a UIC Well on the pad. Please clarify the plans for water injection and water sources.](#)
 - [Water will be gathered via pipeline or trucked from out of reach locations to the Mesa SWD injection facility. Caerus is also planning to inject produced water from other Caerus wells into the injection well. If those wells are at a pad out of reach via pipeline the produced water will be trucked to the injection facility.](#)

Can you please add the additional BMP for the cutting stockpiles to the Form 2As?

- [Provide BMPs for maintaining cuttings stockpiles \(erosion/runoff controls, berms, etc.\)](#)
 - [Stockpiles for topsoil, excess cut material, and drill cuttings will be adequately bermed to prevent lateral migration.](#)

I also apologize for the confusion with the statement for treating the cuttings as soil. If possible can you please remove the disposal descriptions on the Form 2 APDs and replace with the following?

Mesa E1-797 APDs

Please refer to the Drilling and Waste Management Plan submitted with the Form 2A Location Assessment (Doc # 400730168)

Mesa B12-797 APDs

Please refer to the Drilling and Waste Management Plan submitted with the Form 2A Location Assessment (Doc # 400784806)

- COGCC will either reword or remove the following Drilling/Completions COA from the Form 2As,
 - Caerus received clarification from Dave Kubeczko regarding the COA for the SWD ground water sampling so they are aware and will be in compliance with this COA (see attached email).

Crissy Venturo

Regulatory Analyst

Progressive Consulting, Inc.

Cell: 720-352-7916

cventuro@progressivepcs.net

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

Sent: Thursday, April 30, 2015 4:50 PM

To: Crissy Venturo

Cc: Dave Kubeczko - DNR; Diana Burn - DNR

Subject: Caerus Piceance LLC, Mesa B12-797, 2A #400784806, Mesa E1-797, 2A #400730168

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ground water sampling so they are aware and will be in compliance with this COA (see attached email).

Thank you,

John Noto

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John Noto P.G.

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3 attachments



Mesa B12-797_Waste Management Program Revised.pdf
193K



Mesa E1-797_Waste Management Program Revised.pdf
193K



Mesa E1-797_Caerus Correspondence COA 22 Concurrence (3-19-15).pdf
224K