



STATE OF  
COLORADO

EnviroScan - DNR, OGCC <dnr\_ogcc.enviroscan@state.co.us>

## Re: Konig Pit Facility ID 435702

1 message

**Deranleau - DNR, Greg** <greg.deranleau@state.co.us>

Mon, Jul 18, 2016 at 1:03 PM

To: Scott Hudson <Scott.Hudson@crzo.net>

Cc: Trisha Fanning <tfanning@eagle-enviro.com>, David Beckstrom - DNR <david.beckstrom@state.co.us>, "Neslin, Dave" <David.Neslin@dgsllaw.com>, Carol Pruitt <Carol.Pruitt@crzo.net>, Doug Andrews <doug.andrews@state.co.us>

Scott,

Here's what I think would be the best way to handle it.

1. Submit a Form 4 for Location ID #434544 with an updated Location Drawing that shows the frac pad instead of the pit. Please add a comment that describes that no pit was ever constructed on the Oil and Gas Location.
2. Submit a Form 4 for Pit Facility ID #435702 with the following information:
  - indicate that the permitted pit was never constructed,
  - request closure for Pit Facility 435702

By providing these Form 4s the record for both the Location and the Permitted Pit will be complete and clear. I will also upload this correspondence to both files.

I am copying Doug Andrews on this email, as he will be responsible for processing both Form 4s.

Thanks,  
Greg

Cc: Location ID 434544 - CORRESPONDENCE (with attachment)

Cc: Facility ID 4357022 - CORRESPONDENCE (with attachment)

On Mon, Jul 18, 2016 at 12:00 PM, Scott Hudson <Scott.Hudson@crzo.net> wrote:

Greg,

I did some more digging into this. From the documentation I can find, a pad was built to temporarily store freshwater tanks. There was never an earthen pit constructed, either for drilling fluids/cutting or for freshwater. How would you like me to proceed?

**Scott H. Hudson**

**Carrizo Oil & Gas, Inc**

**From:** Deranleau - DNR, Greg [mailto:[greg.deranleau@state.co.us](mailto:greg.deranleau@state.co.us)]

**Sent:** Thursday, July 14, 2016 9:30 AM

**To:** Scott Hudson; Trisha Fanning; David Beckstrom - DNR

**Subject:** [EXT] Konig Pit Facility ID 435702

Good morning,

After our call, I followed up on the Konig Pit. This pit did have a Form 15 and therefore has a Pit Facility ID assigned (435702).

Carol Pruitt submitted a Form 4 to "remove pit location"; Doug Andrews approved the Form 4 on 7/8/16.

However, the original Form 2A (doc #400440261) was approved with 1 drilling pit listed in the inventory and a Freshwater Storage pit, listed in the "Other" equipment section. (See Figure 1) Therefore it is not clear whether the drilling pit should be removed, or the freshwater storage pit.

During COGCC's file review of Facility 435702, it was noted that 2015 aerial imagery shows what appears to be a rectangular ground disturbance off the southwest edge of the well pad location (see Figure 2) This disturbance coincided with Detailed Site Plan (Doc #400465847) included with the approved Form 15 (Doc #400465671). (See Figure 3.) Based on these two pieces of information, COGCC staff adjusted the lat/lon for the pit slightly to the east to be representative of the southeast corner of the pit (permitted location is the "x" in Figure 2)

At this time, it appears (please correct me if I am wrong) that a smaller than permitted drilling pit for a single well was constructed southwest of the wellsite in the same place where the 300x315 freshwater storage pit was proposed on the Form 2A and permitted on the Form 15. In other cases, Carrizo and other operators have included a clarifying statement on the Form 2A that "The freshwater pit is the drilling pit." Without such a clarifying statement, it is not clear whether Carrizo originally intended to have 2 pits on the site or just one that held freshwater for completions and therefore met the definition of a drilling pit. I believe the intent of the Form 4 was to remove the Freshwater Storage pit from the inventory, not remove the drilling pit.

Action required:

In order to completely correct the record for this pit, a Form 4 must be submitted for Facility ID 435702, with the following information:

- indicate that a freshwater or drilling pit was constructed in the footprint of the originally permitted pit,
- provide the dimensions of the pit as constructed,
- certify that no E&P Waste was stored within the pit (thereby ensuring that soils meet the concentration levels of Table 910-1, as required by Rule 1003)
- certify that the pit has been closed in accordance with Rule 1003,
- request closure for Pit Facility 435702

With respect to the Appendix B table to the agreement, then this pit needs to have a checked box in the "Form 4 - Close Pit" column.

Thanks,  
Greg

Figure 1.

**5. Facilities (Indicate the number of each type of oil and gas facility planned on location):**

Special Purpose Pits:	<input type="text"/>	Drilling Pits:	<input type="text" value="1"/>	Wells:	<input type="text" value="4"/>	Production Pits:	<input type="text"/>	Dehydrator Units:	<input type="text" value="2"/>
Condensate Tanks:	<input type="text"/>	Water Tanks:	<input type="text" value="4"/>	Separators:	<input type="text" value="2"/>	Electric Motors:	<input type="text"/>	Multi-Well Pits:	<input type="text"/>
Gas or Diesel Motors:	<input type="text" value="5"/>	Cavity Pumps:	<input type="text"/>	LACT Unit:	<input type="text"/>	Pump Jacks:	<input type="text" value="4"/>	Pigging Station:	<input type="text"/>
Electric Generators:	<input type="text"/>	Gas Pipeline:	<input type="text" value="1"/>	Oil Pipeline:	<input type="text"/>	Water Pipeline:	<input type="text"/>	Flare:	<input type="text" value="1"/>
Gas Compressors:	<input type="text"/>	VOC Combustor:	<input type="text" value="2"/>	Oil Tanks:	<input type="text" value="12"/>	Fuel Tanks:	<input type="text"/>		

Other: **Freshwater Storage pit**, Heater Treater, Separators-one high pressure, one low pressure, Jet pump, one propane tank, Flare until pipeline connection ready.

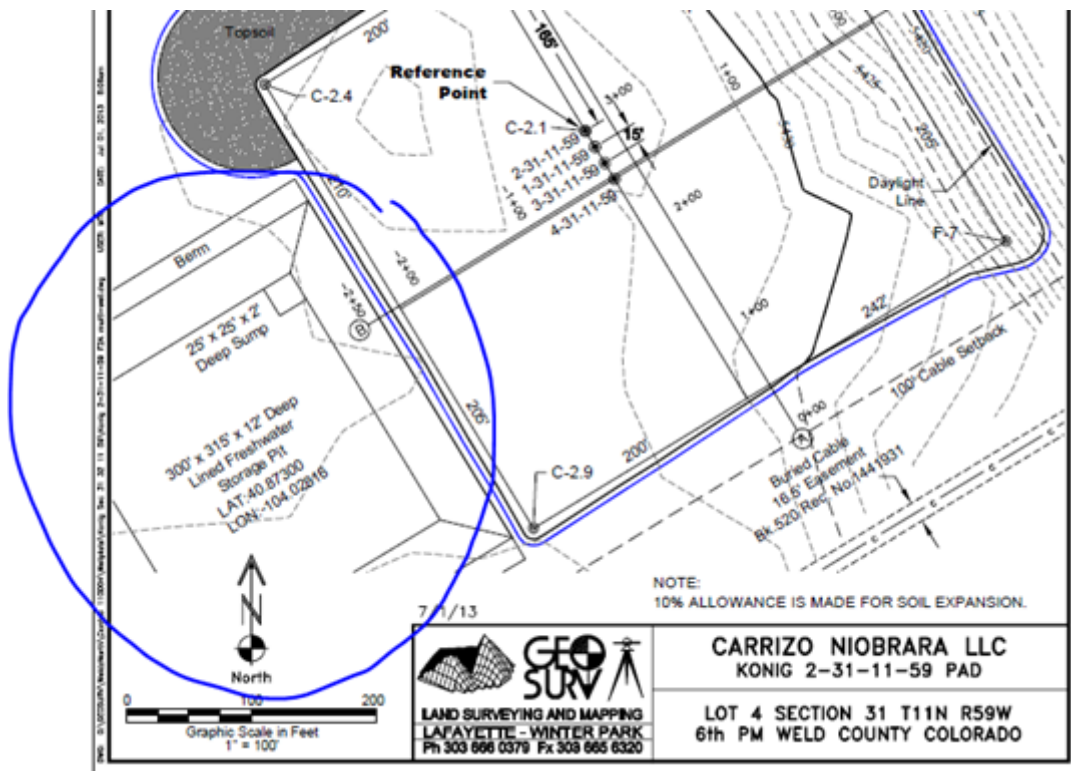
**6. Construction:**

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Figure 2.



Figure 3.



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Environmental Manager



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