



Marathon Oil Company

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August 11, 2008

Chris Canfield
Environmental Protection Specialist
Colorado Oil & Gas Conservation Commission
707 Wapiti Ct. Suite 204
Rifle, CO 81650

RE: NOAV 200191142 & 200191141
Garfield County, Colorado

Dear Mr. Canfield:

In response to Margaret Ash's letter dated August 1, 2008 requesting additional information regarding Notices of Alleged Violations (NOAV) relating to impacts to ground and surface water – SW Sec 14 T6S R97W, Marathon Oil Company provides the following.

Pits:

The drawing provided by Marathon Oil Company in the July 7, 2008 response to NOAV is an "as-built" surveyed drawing of the location. The drawing was prepared from field survey information and was completed under the direction of Will Dolinar, CO PLS #38070.

Marathon Oil did not construct, use, or modify the pit. The drill cuttings in the pit were solidified using 4685 bbls of Soli-Bond[®] patented process. A receipt for the process and MSDS were previously provided to COGCC in the July 7, 2008 response to NOAV. The solidified pit was subsequently covered with topsoil, graded and reseeded as a part of the reclamation process.

Attached to this letter is a Sampling and Analysis Plan prepared by Golder Associates, Inc. The Sampling and Analysis Plan provides a description of the field work proposed by Marathon Oil Company and Petroleum Development Company to collect and analyze soil samples from beneath the reserve pit and of the solidified pit fill material.

Fluids:

1. Fluid hauled from the pit on April 25 and 26, 2008 constituted drilling fluids resulting from the drilling activities conducted by Petroleum Development Corporation and any subsequent snow melt or rain fall that may have contacted the pit. Run tickets for fluids (550 bbls) removed from the pit prior to solidification were provided in the July 7, 2008 response to NOAV. The run tickets were completed by the individual truck drivers and varied in description of the material hauled - "pit water", "production", and "production (pit water)". All loads were fluids resulting from drilling operations and did not contain produced water. Marathon completion operations did not place any fluids in the pit.
2. Water used for completions was fresh water from Parachute Creek. Approximately 55,000 bbls of fresh water were hauled to the location and stored in on-site frac tanks for use.

3. The majority of the fresh water hauled to location was utilized as frac fluid and was pumped down hole and is yet to be flowed back. The residual, excess fresh water (approximately 6,000 bbls) was transferred to Marathon's 13C and 18C pad and utilized as frac fluid.
4. Both of the wells on this pad were stack frac'd without flowback between stages. A total of seven stages were fracture stimulated on each well. After the last stage, a bridge plug was set above the upper-most perforation and tested. The flowback and cleanup of the wells will occur once a sale pipeline is in place and ready to accept gas.

If you have any questions or require additional information please do not hesitate to contact me.

Sincerely,



Adell K. Heneghan, P.E.
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Cc via electronic copy:

Debbie Baldwin, COGCC Environmental Manager,
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