



Correspondence Form 2A  
Document No. 1757240

**Kubeczko, Dave**

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**From:** Miller, Susan [sumiller@suncor.com]  
**Sent:** Monday, September 28, 2009 10:19 AM  
**To:** Kubeczko, Dave  
**Cc:** Robbins, Sherri  
**Subject:** Waggener 8-42, 8-31, 8-35, 8-34 (DIR), 8-33 (DIR), and 8-32 (DIR) - COA's

Dave,

PCR will line the drill pit(s) before drilling operations commence for the following locations:

Waggener 8-42  
Waggener 8-31  
Waggener 8-32 (DIR)  
Waggener 8-33 (DIR)  
Waggener 8-34 (DIR)  
Waggener 8-35

Thank you.

*Susan Miller  
Regulatory Analyst  
999 18<sup>th</sup> Street, Suite 600  
Denver, CO 80202  
Direct Line: 303-350-1212  
Fax: 303-297-7708  
E-mail: sumiller@suncor.com*

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, September 18, 2009 3:22 PM  
**To:** Miller, Susan  
**Cc:** Robbins, Sherri  
**Subject:** Waggener 8-42, 8-31, 8-35, 8-34 (DIR), 8-33 (DIR), and 8-32 (DIR) - COA's

Susan,

Based on the new guidelines designating all locations with a depth to groundwater less than 20 feet bgs a sensitive area, COGCC will require either a lined drilling pit or a closed loop system at any proposed well locations where groundwater is less than 20 feet bgs. Because the best estimate of depth to groundwater at Waggener 8-35 (#1757251) is approximately 12 feet bgs, we will require either a lined drilling pit or a closed loop system during drilling of all four wells at this location (Waggener 8-35, 8-34, 8-33, and 8-32). This is also true for Waggener 8-42 (#1757229) and Waggener 8-31 (#1757240).

If you have any questions, please do not hesitate to call me at (303) 588-5317, or email.

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**From:** Miller, Susan [mailto:sumiller@suncor.com]  
**Sent:** Friday, September 18, 2009 9:55 AM  
**To:** Kubeczko, Dave

**Cc:** Robbins, Sherri  
**Subject:** Waggener 8-42, Waggener 8-31 and Waggener 8-35, 8-34 (DIR), 8-33 (DIR), and 8-32 (DIR) - 2A Review Responses

Sorry - attached are the equipment lists!

*Susan Miller*  
*Regulatory Analyst*  
*999 18<sup>th</sup> Street, Suite 600*  
*Denver, CO 80202*  
*Direct Line: 303-350-1212*  
*Fax: 303-297-7708*  
*E-mail: sumiller@suncor.com*

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**From:** Miller, Susan  
**Sent:** Friday, September 18, 2009 9:34 AM  
**To:** 'Kubeczko, Dave'  
**Cc:** Robbins, Sherri  
**Subject:** Waggener 8-42, Waggener 8-31 and Waggener 8-35, 8-34 (DIR), 8-33 (DIR), and 8-32 (DIR) - 2A Review Responses

Please see responses below:

1. Item 5. Attached please find corrected equipment lists for the noted locations.
2. Item 9. The distances you note are acceptable, please make the changes on the appropriate applications.
3. Item 14. You are correct, the lake to the southeast is the nearest surface water. Please make the correction to note 1655' for the Waggener 8-35 location.
4. Item 14. You are correct, the nearest water well to the Waggener 8-35 location has a static water level of 12'. Please make the appropriate corrections.
5. Item 14. Please provide a detailed e-mail noting each location requiring a drilling pit liner.

Thank you.

*Susan Miller*  
*Regulatory Analyst*  
*999 18<sup>th</sup> Street, Suite 600*  
*Denver, CO 80202*  
*Direct Line: 303-350-1212*  
*Fax: 303-297-7708*  
*E-mail: sumiller@suncor.com*

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Thursday, September 17, 2009 3:36 PM  
**To:** Miller, Susan  
**Subject:** Waggener 8-42 (#1757229), Waggener 8-31 (#1757240), and Waggener 8-35 (#1757251) Form 2A Reviews

Susan,

I have been reviewing the Waggener 8-42 (#1757229), Waggener 8-31 (#1757240), and Waggener 8-35 (#1757251) Form 2As listed in the table below.

Doc No	Number	Distance to Nearest (feet)					Depth to GW
		Building	Public Road	Railroad	Utility	SW	
1757229	8-42	948	1,974	>5,280	~948	ok at 1,350	ok at 12
1757240	8-31	2,044	1,954	>5,280	~2,044	ok at 2,000	ok at 12
1757251	8-35, -34, -33, -32	1,246	1,216	>5,280	~1,246	~1,655 to lake	~ 12

All of these 2As have similar issues and are itemized below:

1. Facilities (Section 5): The facilities list should include equipment used during drilling and production both existing and to be constructed. As such, I would expect gas or diesel motors, generators, and fuel tanks might be on the equipment list. Can you please provide an updated list of equipment for each of the wells
2. Cultural (Section 9): The distances to nearest cultural features included in this section only go out 400 feet. The 400-foot distance is appropriate for the Location Drawing but in this section the information should go out at least one (1) mile. I have included the distances I measured in the above table. Please let me know if you are okay with these distances or can provide your own numbers; I couldn't verify the distance to above ground utilities based on the aerial photos; however, I have estimated them to be associated with the nearest building. Please let me know if you are okay with the revisions or propose your own numbers.
3. Water Resources (Section 14): I could not identify the nearest surface water feature for Waggener 8-35 (#1757251) at 1,281 feet. I'm assuming that there may be a ditch along the road to the west or the south, but I was not able to see it on the 2005 aerial photograph. Can you confirm that there is a ditch, otherwise the nearest surface water feature would be the lake to the southeast, approximately 1,655 feet. .
4. Water Resources (Section 14): The depth to groundwater (GW) of 43 feet for Waggener 8-35 (#1757251) appears to be incorrect. The closest well to the proposed well site is Permit #10797-Wagner which has a total depth of 43 feet but has no listed static water level. However, the screened interval for this well is 7' to 43' bgs. The next closest well is Permit #214375-Campbell (2,572' to the north) which is 240 feet deep with a static water level of 12 feet. Please verify this change.
5. Water Resources (Section 14): ***Because of the shallow groundwater in the area (12 feet or less), I am designating this as a sensitive area and thus requiring either a lined drilling pit or a closed loop system.*** If you have any better data indicating depth to groundwater I would be more than glad to revise the sensitive area recommendation.

Most of these changes are minor except for Number 5, ***Sensitive Area Designation***. If you have any questions, please do not hesitate to call me at (303) 894-2100 x5162, or email.

Regards,  
Dave Kubeczko

David Kubeczko, PG  
Colorado Oil and Gas Conservation Commission  
Oil and Gas Land Assessment

Northwest Area Office  
707 Wapiti Court, Suite 204  
Rifle, CO 81650

Phone: (970) 625-2497  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
dave.kubeczko@state.co.us

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