

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, February 08, 2010 2:03 PM
To: Kubeczko, Dave
Subject: FW: Marathon Oil, 596-33C PAD, SWSW Sec 33 T5S R96W, Garfield County, Form 2A #400002950 Review

Scan No 2032821 CORRESPONDENCE 2A#400002950

From: Walls, Anna V. [mailto:avwalls@marathonoil.com]
Sent: Wednesday, February 03, 2010 2:05 PM
To: Kubeczko, Dave
Cc: Krugh, Frank
Subject: RE: Marathon Oil, 596-33C PAD, SWSW Sec 33 T5S R96W, Garfield County, Form 2A #400002950 Review

Dave,

Marathon agrees to the following COAs being attached to the 596-33C pad Form 2A. If you need additional information, please let me know.

Thank you,
Anna

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, January 27, 2010 7:38 PM
To: Walls, Anna V.
Subject: Marathon Oil, 596-33C PAD, SWSW Sec 33 T5S R96W, Garfield County, Form 2A #400002950 Review

Anna,

I have been reviewing the 596-33C PAD **Form 2A** (#400002950). COGCC requests the following clarifications regarding the data Marathon has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **General:** COGCC's review indicates that the well pad location is approximately 2500 feet from the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit must be lined.
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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