

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, February 16, 2010 9:01 AM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Johnson 05-05 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094413) Review
Attachments: LARAMIE ENERGY II Standard Wildlife BMP.pdf

Scan No 2032853 CORRESPONDENCE 2A#2094413

From: Wayne Bankert [mailto:wbankert@Laramie-Energy.com]
Sent: Monday, February 08, 2010 9:05 AM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Johnson 05-05 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094413) Review

Dave,

Here are my answers to your request below. The 5-05 pad is an existing location.

The pad was constructed in 9/20/2008 2008 and interim reclaimed back in 2009. We need to reopen it to drill again.

1. Dates of construction to commence will be 8/01/2010. Final interim reclamation for all locations will be 8/01/2013. As locations are drilled out and completed, the final interim reclamation reducing the pad to operations size will be completed. All interim on any new roads, pipelines, and initial pad construction will be completed within 1 month of construction completion dependent on time of year.
2. No H2S is anticipated or has been encountered on the 5-05 pad.
3. Water Resources- LEII standard practices
4. Please make the change.
5. COA 38- We comply with the COGCC rules for pit closures on non-crop lands (1003.d.2) which references the 900 series. COA 39- LEII cuttings trenches are excavated in cut.
6. Attached is LEII's Standard Wildlife BMP's for operations in the Piceance.

Wayne P. Bankert

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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Sunday, February 07, 2010 5:04 PM
To: Wayne Bankert
Subject: Laramie Energy II, Johnson 05-05 PAD, Tract 40 Sec 5 T8S R93W, Garfield County, Form 2A (#2094413) Review

Wayne,

I have been reviewing the Johnson 05-05 PAD (#2094413) **Form 2A**. COGCC requests the following clarifications regarding the data Laramie Energy II has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The dates for construction (09/20/2008) and interim reclamation (07/01/2012) appear to be incorrect since the construction date has already passed the dates appear to be too far apart. Forty-seven (47) months seems like a long time between drilling/completion and the start of interim reclamation. COGCC guidelines require that interim reclamation begins 6 months after well drilling/completion on non crop land. Can you confirm the estimated drilling/completion schedule and these dates, or Laramie's rationale for submitted this time frame. I can make the changes (if necessary) if you send an email with this request.
2. **Construction (Section 6):** Form 2A does not indicate if H₂S is anticipated. I assume that it is not. I can make the indication (No) on the Form 2A if you send an email with this request.
3. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 244 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):
 - COA 4** - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 88 feet bgs for a well located 1325 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 174078-A-Johnson, domestic well) to the east-northeast, with a total depth of 108 feet bgs, a depth to groundwater of 34 feet bgs, and a pumping rate of 14 gpm. I believe this is the well you identified. If LEII has more current groundwater level data than that which is in the State's water well database, can you please confirm. Otherwise, I can make the change if you send me an email with this request.
5. **General:** Due to the potentially permeable nature of the surface materials in this area, the following conditions of approval (COAs) will apply:
 - 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.
5. **General:** Can Laramie Energy II resubmit the wildlife BMPs without any reference to CDOW's document that lists BMPs and can any reference to the potential that some wildlife BMPs may be objectionable to the surface owner or anything that may be contrary to any stipulations in LEII's surface use agreement with Johnson. As submitted, COGCC cannot enforce any of these BMPs if they are not acceptable to the surface owner.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed. 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

Colorado Oil & Gas Conservation Commission

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