

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, May 24, 2010 2:23 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Freedom Unit 197-21B1, NESW Sec 21 T1S R97W, Rio Blanco County, Form 2A # 2557179 Review  
**Attachments:** pic24330.gif

Scan No 2033131      CORRESPONDENCE      2A#2557179

-----Original Message-----

From: mark.delpico@exxonmobil.com [mailto:mark.delpico@exxonmobil.com]  
Sent: Monday, May 10, 2010 6:36 AM  
To: Kubeczko, Dave  
Subject: Re: Freedom Unit 197-21B1, NESW Sec 21 T1S R97W, Rio Blanco County, Form 2A #2557179 Review

ExxonMobil concurs with COGCC attaching COA's noted below.

Mark Del Pico      281-654-1926 Office      281-654-1940 FAX  
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Houston, TX      77060

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"Kubeczko,  
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<Dave.Kubeczko  
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To

cc

05/02/10 10:50  
AM

Subject  
Freedom Unit 197-21B1, NESW Sec 21  
T1S R97W, Rio Blanco County, Form 2A  
#2557179 Review

Mark,

I have been reviewing the Freedom Unit 197-21B1 Form 2A (#2557179). COGCC requests the following clarifications regarding the data ExxonMobil has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. Construction (Section 6): Since salt (>15,000 ppm TDS) or oil based muds will be used during drilling; the following condition of approval (COA) will apply:

COA 6 - All pits, except for flare, must be lined.

1. Water Resources (Section 14): Form 2A indicates the distance to the nearest surface water is 1000 feet; however, the construction Layout Drawings and the Hydrology Map show several intermittent streams/drainages actually running through the proposed well pad. The following conditions of approval (COAs) will apply:

COA 4 - 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.

1. General: Due to the highly fractured nature of the surface material 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.

COGCC would appreciate your concurrence with attaching this COA 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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