

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, July 13, 2010 4:15 PM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Leverich 31-12 Pad, Lot 3 Sec 31 T6S R93W, Garfield County, Form 2A (#400069149) Review

Scan No 2033252 CORRESPONDENCE 2A#400069149

From: Wayne Bankert [mailto:wbankert@laramie-energy.com]
Sent: Tuesday, June 29, 2010 7:56 AM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Leverich 31-12 Pad, Lot 3 Sec 31 T6S R93W, Garfield County, Form 2A (#400069149) Review

Dave,
Please make the change to the surface water distance.
LEII is fine with the COA's. Standard Operating Practices for us.
Thanks

Wayne P. Bankert
Senior Regulatory & Environmental Coordinator
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wbankert@laramie-energy.com

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, June 28, 2010 3:47 PM
To: Wayne Bankert
Subject: Laramie Energy II, Leverich 31-12 Pad, Lot 3 Sec 31 T6S R93W, Garfield County, Form 2A (#400069149) Review

Wayne,

I have been reviewing the Leverich 31-12 Pad **Form 2A** (#400069149). COGCC requests the following clarifications regarding the data Laramie Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 1653 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates an intermittent stream located approximately 56 feet to the east. I can make the change if you send an email with this request. COGCC guidelines require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) 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.

2. **General:** Due to the steep slopes in this area (averaging 18 percent) and the potentially permeable and unstable landslide deposits in the area, the following conditions of approval (COAs) will also apply:

COA 6 - Reserve pit must be lined or closed loop system must be implemented during drilling.

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) 309-2514 (cell), or email. Thanks.

Dave

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

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