

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, August 31, 2010 8:29 AM
To: Kubeczko, Dave
Subject: FW: North Piceance Unit 197-5A, NWSE Sec 5 T1S R97W, Rio Blanco County, Form 2A # 400081228 Review
Attachments: pic25790.gif

Scan No 2033334 CORRESPONDENCE 2A#400081228

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

From: roy.l.springfield@exxonmobil.com [mailto:roy.l.springfield@exxonmobil.com]
Sent: Thursday, August 19, 2010 10:21 AM
To: Kubeczko, Dave
Subject: Re: North Piceance Unit 197-5A, NWSE Sec 5 T1S R97W, Rio Blanco County, Form 2A #400081228 Review

Dave:

I concur with the COA's as below.

Thanks,

Roy L. Springfield
Regulatory Specialist
Exxon Mobil Corporation
USP Permitting Group - Wyoming, Colorado & New Mexico

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"Federal and State regulations require accurate submittal of all permits prior to commencement of work and timely follow - up reports. Failure to comply with the regulations places ExxonMobil in jeopardy of receiving civil and criminal penalties. Notices of Violation (NOV's), Incidents of Non - Compliance (INC's), production shut - in, loss of credibility, and/or negative publicity. USP - Permits appreciates your assistance in providing the requested data."

"Kubeczko,
Dave"

<Dave.Kubeczko
@state.co.us>

To
<roy.l.springfield@exxonmobil.com>
cc

08/16/2010
03:49 PM

Subject
North Piceance Unit 197-5A, NWSE Sec
5 T1S R97W, Rio Blanco County, Form
2A #400081228 Review

Roy,

I have been reviewing the North Piceance Unit 197-5A Form 2A (#400081228). Since a Form 2 (Document No. 01715213, Permit No. 20092776) for this well location was submitted previously (06-250-2009) and approved (10-26-2009), this is not considered a New Location on the Form 2A, but rather an Amend Existing Location (Location #418617). I have made this change. 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) review.

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.

2. 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 these COAs to the Form 2A permit prior to passing the OGLA review. The general COAs had been previously attached to Form 2#1715213 (submitted on June 25, 2009) for well North Piceance Unit 197-5A1, and approved on October 26, 2009 (Permit No. 20092776). 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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