

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 14, 2010 10:09 AM
To: Kubeczko, Dave
Subject: FW: Whiting Oil and Gas Corp, WRD 23-33, NESW Sec 33 T2N R97W, Rio Blanco County, Form 2A (#400086812) Review

Scan No 2033367 CORRESPONDENCE 2A#400086812

From: Scott Webb [mailto:ScottW@whiting.com]
Sent: Tuesday, September 14, 2010 10:01 AM
To: Kubeczko, Dave
Subject: RE: Whiting Oil and Gas Corp, WRD 23-33, NESW Sec 33 T2N R97W, Rio Blanco County, Form 2A (#400086812) Review

Whiting Oil and Gas corporation does concur with the COA numbers 4, COA 5, COA 9, COA 38, COA 39 and COA 46 as outlined.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, September 14, 2010 9:18 AM
To: Scott Webb
Subject: RE: Whiting Oil and Gas Corp, WRD 23-33, NESW Sec 33 T2N R97W, Rio Blanco County, Form 2A (#400086812) Review

Scott,

I have tentatively made the changes listed in items 1 and 2; however, COGCC would still appreciate your concurrence with these changes. Please send attachments to me; COGCC cannot return a Form 2A to draft after it has been put IN PROCESS. I will attach them. Thanks.

Dave

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

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From: Scott Webb [mailto:ScottW@whiting.com]
Sent: Monday, September 13, 2010 1:57 PM
To: Kubeczko, Dave
Subject: RE: Whiting Oil and Gas Corp, WRD 23-33, NESW Sec 33 T2N R97W, Rio Blanco County, Form 2A (#400086812) Review

Dave,

I am going through your e-mail and have opened up the 2A doc for the well. I see that the items pertaining to #1 and #2 of your e-mail have been corrected.

For #3, I do have production facilities, cut and fill and x-section diagrams for this pad, but I cannot attach them to that for as it is blocked.

I did send those items in the original filing, but they were returned by Kent Kuster.

Do you want them sent to you?

Or if you can return the 2A to draft status I can attached those items.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, September 09, 2010 3:45 PM
To: Scott Webb
Subject: Whiting Oil and Gas Corp, WRD 23-33, NESW Sec 33 T2N R97W, Rio Blanco County, Form 2A (#400086812) Review

Scott,

I have been reviewing the WRD 23-33 **Form 2A** (#400086812). Since there are two previous wells at this location with the same location Number 398432, COGCC considers this an existing location, not a new location (this has been changed on the Form 2A). COGCC requests the following clarifications regarding the data Whiting Oil and Gas has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map Unit #10. Blazon, moist-Rentsac complex, 8 to 65 percent slopes. COGCC's review indicates that the primary soil type is Map Unit #1. Abor clay loam, 5 to 30 percent slopes. COGCC has made this change and attached the NRCS reports. In the future, COGCC would appreciate it if Whiting could provide the map unit description along with the physical properties.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2170 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 there is an intermittent stream located approximately 498 feet to the northeast (as shown on the USGS Topographic Map). I can make the change if you send me 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 proximity to surface water (irrigation ditch to the northwest and intermittent stream to the west); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of

berms/dikes, site grading, or other comparable measures (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

3. **Rule 303.d.(3).H.:** Where the location disturbance is to occur on lands with a slope ten percent (10%) or greater (COGCC's review of the site topography indicates an approximate grade of 13 percent), COGCC requests the following, a construction layout drawing showing cut and fill areas, and a location cross-section plot showing cut and fill areas, as well as locations of any pits is required. The construction layout drawing should also show the locations of existing facilities and the anticipated locations of new facilities.

4. **General:** Due to the potentially permeable nature of the surface material in this area, the following conditions of approval (COAs) will apply:

COA 9 - Any pit constructed to hold fluids (reserve pit, production pit; except for flare pit) must be lined.

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.

COA 46 - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and/or stormwater runoff.

COGCC would appreciate your concurrence with attaching these COAs (items 2 and 4) to the Form 2A permit prior to passing the OGLA review. The other issue (item 3) also needs to be address prior to permit approval. 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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