

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, September 14, 2010 5:38 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Wellstar Corporation, Bush Draw Federal 10-2, SENE Sec 10 T8N R78W, Jackson County, Form 2A #400084933 Review

**Categories:** Brown Category

Scan No 2033382      CORRESPONDENCE      2A#400084933

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**From:** Terry Hoffman [mailto:tlhoffman@q.com]  
**Sent:** Tuesday, August 31, 2010 12:16 PM  
**To:** Kubeczko, Dave  
**Cc:** rmpbrady  
**Subject:** Re: Wellstar Corporation, Bush Draw Federal 10-2, SENE Sec 10 T8N R78W, Jackson County, Form 2A #400084933 Review

It is ok with the operator to attach these conditions of approval to the Form 2A for the above mentioned location.

Please respond to this email so that I know your received it.

Thank you,

Terry L. Hoffman  
Permitting Agent

Rocky Mountain Permitting, LLC  
Specializing in O&G Permitting & Regulatory Compliance

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

**From:** [Kubeczko, Dave](#)  
**To:** [tlhoffman@q.com](mailto:tlhoffman@q.com)  
**Sent:** Tuesday, August 31, 2010 11:45 AM  
**Subject:** Wellstar Corporation, Bush Draw Federal 10-2, SENE Sec 10 T8N R78W, Jackson County, Form 2A #400084933 Review

Terry,

I have been reviewing the Bush Draw Federal 10-2 **Form 2A** (#400084933). COGCC will attach the following conditions of approval (COAs) based on the data Wellstar Corporation has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 260 feet. COGCC guidelines require designating all locations with close proximity to surface water 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; 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 sufficiently protective of nearby surface water. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

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

2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 36 feet bgs for a well located 1960 feet away from the proposed pad. Although the depth to groundwater cannot be confirmed to be less than 20 feet bgs at this well location, the potential exists for surface releases to reach groundwater due to the potentially permeable nature of the unconsolidated alluvial sands and gravels in this area; therefore, the following condition of approval (COA) will apply:

**COA 2** - Location may be in a sensitive area due to shallow groundwater; therefore, either a lined drilling pit or closed loop system must be implemented.

3. **General:** The following conditions of approval (COAs) will also 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. 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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