

From: [Spry ORourke, Linda](#)
To: [Spry ORourke, Linda](#); [Blaney, Karolina](#)
Cc: [Fischer, Alex](#); [Kubeczko, Dave](#)
Subject: RE: Form 15 Pit Permit - KP 32-17 Multi-well completion pit
Date: Wednesday, August 04, 2010 3:15:26 PM

Karolina,

As a follow up to our conversation today, the COGCC does require water analysis (Form 26 data) for each well that will be contributing to a multi-well permit.

Please include the analyses for wells that were not represented in the initial Form 15 packet when you provide the revised/additional pages.

Thanks.

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From: Spry ORourke, Linda
Sent: Monday, August 02, 2010 7:30 AM
To: 'Blaney, Karolina'
Cc: Fischer, Alex; Kubeczko, Dave
Subject: Form 15 Pit Permit - KP 32-17 Multi-well completion pit

Karolina,

I've reviewed the above-mentioned pit permit and identified some items that need revision.

1. The cover letter refers to the pit as being in Section 7, but the pit permit refers to Section 17. Please clarify. If it is the cover letter in error, send a revised cover letter.
2. The location is in a 317B external buffer zone, thus Rule 317B.e requirements apply.
3. The location is in a sensitive area, even if the ephemeral drainage 175 feet to the west has been reworked, thus COGCC disagrees with the sensitive area determination conclusion
4. The sensitive area determination page for Groundwater appears to be incomplete. Item 6 indicated depth to groundwater is unknown (which COGCC agrees with) and

the instructions refer to section 5(b). Items (i) and (ii) appear to have been conducted but data from the last two items are not provided: item (iii) Drill a soil boring to determine depth to groundwater or (iv) Model hydrogeologic conditions to determine if the potential to impact groundwater is high or low. Provide information regarding the evaluation of potential for a release from this facility to reach groundwater.

5. The pit diagram does not include berms around the pit. The pit must have lined berms on all sides to prevent overflow and provide containment.
6. The pit is to be constructed in moderately high to highly permeable material. The pit will require a leak detection system (Rule 904.e). Update the pit construction plan to include details of the leak detection system which will be installed
7. Provide a cross-reference between the Water Analysis Reports and the List of Source Wells. There are 37 wells listed as source wells but only water analysis for 15 wells. Explain why water analyses for all 37 wells is not provided or provide that analysis.
8. There is no meter house depicted on the site diagram. Include it or explain why it is not included (Appendix I)
9. Design calculations for pit volume are not present. Include them (Appendix I)
10. Daily inflow rate is missing; include estimated flow rate (Appendix I).
11. Form 15 reports pit depth as 19-20 feet, but the construction diagram reports pit depth as 16 feet. Resolve discrepancy.

Revise the pages of the pit permit containing the above information and resubmit.

Thanks

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