From: Deranleau, Greg
To: Koepsell, Arthur
Subject: FW: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge
Date: Friday, September 10, 2010 3:29:00 PM
Attachments: Mackinaw 21-28 Location Map with Revised.pdf

Arthur,
I'll pass this off to you, now. Please update the location map and make sure that the statement by Yvonne early in this thread is included on the Form 2A.

Thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
303-894-2100 ext. 5153

STATE OF COLORADO OIL & GAS CONSERVATION COMMISSION

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Friday, September 03, 2010 4:53 PM
To: Deranleau, Greg
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Greg,

Thank you for reviewing our permit.

We initially selected the nearest water 2,335' as the closest stream bed does not appear to be a creek or stream and does not contain water. I am in agreement with you on changing the nearest water on Form 2A to 509' from 2,335'. Similarly, a different public road (other than Indian Hill Rd.) was initially selected as Indian Hills Rd. is a deserted two track path. However, as the road appears in maps I am in agreement with your assessment to change the distance to the nearest public road to 160' from 530'.

Attached please find a revised location drawing with the modifications you requested. Please note that the dwelling units to the south of the location are more than 350' from the proposed wellbore or production equipment. Please let me know if we need to make additional modifications to the location drawing and if I need to upload the revise drawing.

Please let me know if you have any additional questions or require more information.

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Deranleau, Greg [mailto:Greg.Deranleau@state.co.us]
Sent: Thursday, September 02, 2010 5:04 PM
To: Moe Felman
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Moe,

COGCC has completed the review of the referenced Form 2A. The following items were identified during the review as requiring change or additional information. I apologize for sending a second set of requests, we typically try to have everything put together at once, but with Valerie's recent retirement, a few Form 2As were caught in transition.

Water Resources
The hydrology map indicates a dry stream bed 509' to the northeast. COGCC will change the distance to nearest water on the Form 2A to 509' from 2,335' as the dry stream bed is consistent with our 100-series definition of "Waters of the State." This will change will not affect the Sensitive Area determination or require additional conditions of approval (COA).

Cultural
Based on the Access Road Map and a review of aerial photos, COGCC will change the distance to the nearest public road to 160' from 530' based on the apparent public use of Indian Hill Road to the north of the oil and gas location.

Location Drawing (attachment)
The Location Drawing as submitted does not meet the requirements of 303.d.(3)C. It does not identify "all visible improvements within four hundred (400) feet of the proposed oil and gas location", and it does not include "a description of surface uses within the four hundred (400) foot radius". Specifically, the items on the property to the northwest are not identified (I'm not suggesting you inventory that property, but provide COGCC with information about the nature of the apparent storage and the general land use); the cluster of building to the southeast (east of the "nearest Structure") is not identified; the casual use roads within your radius could also be considered visible improvements; fence lines, if present, would be visible improvements; etc.

One more thing to consider is that the 500' buffer as shown does not include all areas within 400' of your proposed oil and gas location. Extending 400' from the edge of disturbance (using the proposed pad layout on the Access Road Map) creates a rectangle with curved corners (radius = 400'). While the difference is minimal on this location, the discrepancy becomes larger on larger locations or more rectangular locations. A scanned image showing this difference is attached.

Please provide a revised Location Drawing and indicate your concurrence to the 2 listed changes in a reply to this e-mail. The public comment period for this Form 2A will expire on September 14, 2010, with your response and barring any public comment, we hope to pass this on the 15th.

Thanks,

Greg Deranleau

Oil & Gas Location Assessment Supervisor
303-894-2100 ext. 5153

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Wednesday, September 01, 2010 8:31 AM
To: Deranleau, Greg
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Greg,

I am in agreement.

Thanks,

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Deranleau, Greg [mailto:Greg.Deranleau@state.co.us]
Sent: Wednesday, September 01, 2010 7:31 AM
To: Moe Felman
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Thanks for the update. Based on your e-mail from 8/27/2010 (below) it appears that you plan to comply with all 603.e. (1-17) rules, including 603.e.(4)C, which was previously in question. If so, we will include the language originally discussed by Valerie and Yvonne

Greg Deranleau
Oil & Gas Location Assessment Supervisor
303-894-2100 ext. 5153

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Wednesday, September 01, 2010 7:02 AM
To: Deranleau, Greg
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Greg,

The on-site evaluation of the building units confirmed that the location of the subject well is in a high density area.

Regards,

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Moe Felman
Sent: Tuesday, August 31, 2010 10:55 AM
To: 'Deranleau, Greg'
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Greg,

We are counting mobile homes and RVs as dwelling units. Thanks.

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Deranleau, Greg [mailto:Greg.Deranleau@state.co.us]
Sent: Tuesday, August 31, 2010 10:54 AM
To: Moe Felman
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Thanks, Moe. FYI, a recent discussion among staff here concluded that mobile homes and even RVs (when in use, not storage) are considered building units. I am pretty sure that some of those properties are developed with mobile homes.

thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
303-894-2100 ext. 5153

STATE OF COLORADO
OIL & GAS
CONSERVATION COMMISSION

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Tuesday, August 31, 2010 10:38 AM
To: Deranleau, Greg
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Greg,

Out initial analysis was based on the potential building units in the southern semicircle (1,000' radius). However, some buildings units may not be dwelling units. We are doing an on-site evaluation this morning of the buildings. I will inform you on the result of this evaluation, hopefully later on today.

Regards,

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Deranleau, Greg [mailto:Greg.Deranleau@state.co.us]
Sent: Tuesday, August 31, 2010 8:58 AM
To: Moe Felman
Cc: Walker, Valerie
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Moe,

Sorry to chime in late on this. My review of the aerial photos is consistent with your initial analysis that the location is in a high density area. It will still be good to confirm on the ground, but the definition (603.b.) allows for 18 or more building units within a 1,000 ft radius semi-circle. It appears that the building units (residences) in the Highland Avenue neighborhood will just about make up that number plus the loosely developed land southwest of the location within the same semi-circle. The nursing home to the west-southwest appears outside the 1,000 foot distance from the wellhead, but may be within 1,000 feet of your production facilities, depending on how the location is laid out.

As Valerie indicated, please direct future correspondence with me on this issue.

Thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
303-894-2100 ext. 5153

STATE OF COLORADO
OIL & GAS
CONSERVATION COMMISSION

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Tuesday, August 31, 2010 8:23 AM
To: Walker, Valerie; Deranleau, Greg
Cc: Stanczyk, Jane; Vigil, Julie
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Valerie,

I apologize for not responding to you yesterday on whether the site is located in a high density area. We are inspecting the site today and will let you know as soon as I obtain the information.

Regards.

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Moe Felman
Sent: Friday, August 27, 2010 4:14 PM
To: Moe Felman; 'Walker, Valerie'
Cc: 'Deranleau, Greg'; 'Stanczyk, Jane'; 'Vigil, Julie'
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Valerie,

Pine Ridge will "not" request a variance to rule 603.e.(4)C. I will confirm on Monday is the site is located in a high density area.

Regards,

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Moe Felman
Sent: Friday, August 27, 2010 3:45 PM
To: 'Walker, Valerie'
Cc: Deranleau, Greg; Stanczyk, Jane; Vigil, Julie
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Valerie,

We determined that the site was in a high density area by looking at aerial photos. This may not be the best way to determine the type of building units. I will go to the site on Monday to determine if the site is located in a high density area. Once this is defined, I will let you know and will also confirm if we will request a variance on rule 603.e.(4)C.

Thanks,

Moe Felman
Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Walker, Valerie [mailto:Valerie.Walker@state.co.us]

Sent: Friday, August 27, 2010 2:56 PM
To: Moe Felman
Cc: Deranleau, Greg; Stanczyk, Jane; Vigil, Julie
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Moe,

Thanks for the map. Your email says buildings. The rule (603.b.) says building UNITS. I would make sure that the "buildings" are "building units" per the 100 series definition. I cannot tell based on the aerial photos.

If they do meet the "building Unit" criteria then:
Please **confirm** that the high density rule that Pine Ridge cannot meet is Rule 603.e.(4)C. Pit Level Indicators.
I will need to know which rule Pine Ridge will be requesting a variance for to discuss the process further with my management.

Read Rule 306.d.(1)A.ii. and Rule 306.d.(2)D.
I believe you will need to consult with the CDPHE because you will be asking for a variance to the 603 rules.

You will need to provide details on why Pine Ridge cannot meet the Rule and, most likely, need to propose an alternative method to be employed that will provide the same protection as the rule requires.

Call me Monday and we can discuss further. FYI – re-check the proposed footage to top and bottom of producing zone given on Pine Ridge's Form 2.

You may also want to call Jane Stanczyk (x5119) to ensure that the proposed well bore is legal. Tell her it is document #400087054.

Valerie A. Walker
Oll and Gas Location Assessment
Colorado OIl & Gas Conservation Commission
1120 Lincoln St. Suite 801
Denver CO 80203
303-894-2100 x5102

From: Moe Felman [mailto:Moe.Felman@cometridgeresources.com]
Sent: Friday, August 27, 2010 1:28 PM
To: Walker, Valerie
Cc: Yvonne E. Durham
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Valerie,

We selected the High Density checkbox because there is more than 18 buildings in the southern part of the 1000' radius area. Please note the attached map.

Moe Felman

Comet Ridge Resources, LLC
Direct: 303-226-6860 / Mobile: 303-585-1309

From: Walker, Valerie [mailto:Valerie.Walker@state.co.us]
Sent: Friday, August 27, 2010 10:57 AM
To: Yvonne E. Durham; Moe Felman
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Moe,

I received your voice message regarding the inability to meet Rule 603.e.(4).

Lets take a step back. Please provide the data used to determine that the proposed location is in a high density area. Rule 603.b. and c. and building unit definition in the 100 series.

Valerie A. Walker
Oll and Gas Location Assessment
Colorado OIl & Gas Conservation Commission
1120 Lincoln St. Suite 801
Denver CO 80203
303-894-2100 x5102

From: Yvonne E. Durham [mailto:Yvonne.Durham@cometridgeresources.com]
Sent: Thursday, August 26, 2010 3:48 PM
To: Walker, Valerie
Cc: Moe Felman
Subject: RE: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Valerie, Moe has been in a meeting most of the day, but on a break he authorized me to respond to you, to confirm we DO want you to add this statement you suggested to the Form 2A:

Proposed location will meet all the High Density rules (Rule 603.e.(1) – (17).

Also, I am attaching the NRCS Map Unit Description for the other soil area near the Mackinaw 21-28, (71) Midway clay loam.

Thanks, Valerie!

Yvonne

From: Moe Felman
Sent: Thursday, August 26, 2010 1:41 PM
To: Yvonne E. Durham
Subject: Fwd: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge

Yvonne,

Could you please review Valerie's email below. Let's talk about this before you send a response. Thanks.

Moe Felman

Sent from iPhone

Begin forwarded message:

> **From:** "Walker, Valerie" <Valerie.Walker@state.co.us>
> **Date:** August 26, 2010 1:28:14 PM MDT
> **To:** "Moe Felman" <Moe.Felman@cometridgeresources.com>
> **Subject: Mackinaw 21-28 Form 2A doc #400087210 Pine Ridge**
>
> Moe,
>
> COGCC is reviewing the Form 2A (doc # 400087210) for the proposed Mackinaw 21-28 Oil & Gas location, NENW 28-19S-69W, Fremont County, CO. COGCC requests the following regarding the submitted data and attachments to the Form 2A prior to passing the Oil & Gas Location Assessment (OGLA).
>
> SOILS
> Based on the size and location, IT looks like Pine Ridge is proposing a surface disturbance that will cover more than one soil type.
> Please email to me the map unit description for the other soil type and I will attach it and add the soil name to the form.
>
> HIGH DENSITY AREA
> Pine Ridge has checked high density = yes, Based on the area of disturbance, distance to nearest building and proposed facilities, I cannot tell if all the proposed location will meet all the High Density rules (Rule 603.e.(1) – (17)). Rather than you providing me with the sketches, I propose Pine Ridge adding into the "COMMENTS" section the statement "proposed location will meet all the High Density rules (Rule 603.e.(1) – (17)".
>
> By response to this email, please let me know that you are okay with this addition and please supply the requested attachment.
>
> Valerie A. Walker
> Oll and Gas Location Assessment
> Colorado OIl & Gas Conservation Commission
> 1120 Lincoln St. Suite 801
> Denver CO 80203
> 303-894-2100 x5102