

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, November 10, 2010 7:21 AM
To: Kubeczko, Dave
Subject: FW: Dakota Exploration LLC, Arapaho State 6-81-36-3, NENW Sec 36 T6N R81W, Jackson County, Form 2A (#400102084) Review

Categories: Brown Category

Scan No 2033495 CORRESPONDENCE 2A#400102084

From: Fabrianna [<mailto:fabrianna@jameskaro.com>]
Sent: Monday, November 01, 2010 2:27 PM
To: Kubeczko, Dave
Subject: RE: Dakota Exploration LLC, Arapaho State 6-81-36-3, NENW Sec 36 T6N R81W, Jackson County, Form 2A (#400102084) Review

Dave,

The Operator accepts the conditions of approval as set forth below.

Thank you for your time,

fabrianna venaducci
james c karo associates
303.279.0789

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From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Monday, November 01, 2010 2:00 PM
To: Fabrianna
Subject: Dakota Exploration LLC, Arapaho State 6-81-36-3, NENW Sec 36 T6N R81W, Jackson County, Form 2A (#400102084) Review

Fabrianna,

I have been reviewing the Arapaho State 6-81-36-3 **Form 2A** (#400102084). COGCC would like to attach the following conditions of approval (COAs) based on the information and the data Dakota 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 depth to groundwater to be 33 feet bgs for a well located 4313 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater (this well location is within coarse-grain unconsolidated alluvium) a **sensitive area**. The following conditions of approval (COA) will apply:
 - COA 7** - Location is in a sensitive area because of the potential for shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
 - COA 8** - Location is in a sensitive area because of the potential for shallow groundwater; therefore production pits (if constructed) must be lined.
2. **General:** The following conditions of approval (COAs) will also apply:
 - COA 6** - Reserve pit must be lined or a closed loop system must be implemented during drilling.
 - COA 25** - Flowback to tanks only. Operator must submit a secondary and tertiary containment plan via sundry notice Form 4 for the tanks to Dave Kubeczko.
 - 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 surface soils and materials are fine-grained and highly unconsolidated; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after well pad construction completion, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 2) 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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