

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, January 07, 2011 11:16 AM
To: Kubeczko, Dave
Subject: FW: EOG Resources, Inc, Hebron 3-12H, NENE Sec 12 T7N R81W, Jackson County, Form 2A (#400117989) Review

Scan No 2033574 CORRESPONDENCE 2A#400117989

From: Jennifer_Yu@eogresources.com [mailto:Jennifer_Yu@eogresources.com]
Sent: Thursday, January 06, 2011 4:39 PM
To: Kubeczko, Dave
Subject: Re: EOG Resources, Inc, Hebron 3-12H, NENE Sec 12 T7N R81W, Jackson County, Form 2A (#400117989) Review

Hi Dave,

EOG concurs with the COAs outlined in this email.

Jennifer Yu
EOG Resources, Inc.
Phone: 303-824-5576
Fax: 303-824-5577

▼ "Kubeczko, Dave" ---01/01/2011 02:44:07 PM---Jennifer,

From: "Kubeczko, Dave" <Dave.Kubeczko@state.co.us>
To: <jennifer_yu@eogresources.com>
Date: 01/01/2011 02:44 PM
Subject: EOG Resources, Inc, Hebron 3-12H, NENE Sec 12 T7N R81W, Jackson County, Form 2A (#400117989) Review

Jennifer,

I have been reviewing the Hebron 3-12H **Form 2A** (#400117989). COGCC would like to attach the following conditions of approval (COAs) based on the data EOG resources 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 166 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which EOG has indicated on the Form 2A). The following conditions of approval (COAs) will apply:

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

COA 9 - Reserve pit must be lined or a closed loop system (which EOG has indicated on

the Form 2A) must be implemented during drilling.

COA 23 - 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.

2. **Water Resources (Section 14)**: Form 2A indicates the depth to groundwater to be 2 feet bgs for a well located 3071 feet from the well pad. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area** (which EOG has indicated on the Form 2A). The following conditions of approval (COAs) will apply:

COA 7 - Location is in a sensitive area because shallow groundwater; therefore either a lined drilling pit or closed loop system (which EOG has indicated on the Form 2A) must be implemented.

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.

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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