

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, January 20, 2011 1:48 PM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, High Lonesome Ranch 17-01 Pad, NENE Sec 17 T7S R98W, Garfield County, Form 2A (#400121642) Review

Scan No 2033592 CORRESPONDENCE 2A#400121642

From: Wayne Bankert [<mailto:wbankert@laramie-energy.com>]
Sent: Thursday, January 20, 2011 8:52 AM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, High Lonesome Ranch 17-01 Pad, NENE Sec 17 T7S R98W, Garfield County, Form 2A (#400121642) Review

Dave

LEI has no issues with the recommended COA's as most are Standard Operating Procedures for our operations in the Piceance.

Thanks

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From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Thursday, January 20, 2011 8:41 AM
To: Wayne Bankert
Subject: Laramie Energy II, High Lonesome Ranch 17-01 Pad, NENE Sec 17 T7S R98W, Garfield County, Form 2A (#400121642) Review

Wayne,

I have been reviewing the High Lonesome Ranch 17-01 Pad **Form 2A** (#400121642). COGCC would like to attach the following conditions of approval (COAs) based on the information and data 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 300 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**; therefore, the following conditions of approval (COAs) will apply:
COA 4 - Location is in a sensitive area because of its 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 (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

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

2. **General:** Since the location is in close proximity to and within several intermittent drainages of Kimball Creek, the following conditions of approval (COAs) will also apply:

COA 25 - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

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 (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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