

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, March 29, 2011 1:25 PM
To: Kubeczko, Dave
Subject: FW: Laramie Energy II, Hawxhurst 17-04 Pad, NWNW Sec 17 T9S R94W, Mesa County, Form 2A (#400136456) Review

Scan No 2033672 CORRESPONDENCE 2A#400136456

From: Wayne Bankert [<mailto:wbankert@laramie-energy.com>]
Sent: Monday, March 28, 2011 1:40 PM
To: Kubeczko, Dave
Subject: RE: Laramie Energy II, Hawxhurst 17-04 Pad, NWNW Sec 17 T9S R94W, Mesa County, Form 2A (#400136456) Review

Dave,
Laramie is agreeable to the proposed COA's

Wayne P. Bankert
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From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Monday, March 28, 2011 1:22 PM
To: Wayne Bankert
Subject: Laramie Energy II, Hawxhurst 17-04 Pad, NWNW Sec 17 T9S R94W, Mesa County, Form 2A (#400136456) Review

Wayne,

I have been reviewing the Hawxhurst 17-04 Pad **Form 2A** (#400136456). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Laramie Energy II 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 66 feet bgs for a well located 3400 feet from the proposed well pad. COGCC's review indicates the depth to groundwater for this water well is 12 feet bgs (also shown on Hydrology Map). I have made this change. COGCC's guidelines require designating all locations with shallow groundwater a **sensitive area**.
2. **General:** Since the location is near many irrigation ditches and intermittent drainages, as well as the potential for shallow groundwater, 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 or buried pipelines.

COA 9 - A closed loop system (as indicated by operator on the Form 2A) must be implemented, otherwise, Any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) must be lined.

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 (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 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 46 - The location is in an area of high run off/run-on potential (steep grade to the west) and underlain by fine grained loams; therefore the pad shall be constructed to prevent any stormwater run-on and/or stormwater runoff. 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.

COA 44 - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

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 (item 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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