

From: [Smalley, Carl](#)
To: [Koepsell, Arthur](#)
Cc: [Tritt, Tannis](#); [Jay Jones](#)
Subject: RE: TSA UNIT 1-14 FORM 2A# 400229400, Mull Drilling
Date: Tuesday, December 06, 2011 2:52:45 PM

Arthur

Thanks for the good visit on the phone. I'm glad I am not the only one having trouble with the new COGCC map program and the NRCS link.

The COA for the presence of hydrogen sulfide I concur with your directive.

Because the NRCS link is not allowing users to access the needed reports --- I will not be able to provide you the needed KIM-HARVEY-STONEHAM LOAMS, 1 - 3 PERCENT SLOPES report. Thank you for your understanding on this issue --- as per conversation on phone.

Mull Drilling Company Inc.
Carl Smalley
Environmental Manager
office 719-767-8805
cell 719-342-1812

From: Koepsell, Arthur [Arthur.Koepsell@state.co.us]
Sent: Tuesday, December 06, 2011 3:15 PM
To: Smalley, Carl
Subject: TSA UNIT 1-14 FORM 2A# 400229400, Mull Drilling

Carl,

The COGCC is reviewing the Form 2A (#400213661) for the Mull Drilling TSA UNIT 1-14 location, located in the SWNW Sec 14 T17S R45W Kiowa County, Colorado. The COGCC requests the following changes regarding the data submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

SOILS

Based on a review of the soil maps on the COGCC website the KIM-HARVEY-STONEHAM LOAMS, 1 - 3 PERCENT SLOPES MAP UNIT DESCRIPTION #21 soil type should be added to the form 2A. Please provide the NRCS description for the above referenced soil.

Due to the presence of hydrogen sulfide in the oil and gas fields surrounding the proposed location the following COA will apply to the TSA UNIT 1-14 location.

In accordance with Rule 607.c., operator shall provide notice of any gas analysis indicating the presence of hydrogen sulfide on the proposed location including pipelines, production equipment and tanks. Submit notices to COGCC's area engineer, Dirk Sutphin, at dirk.sutphin@state.co.us <<mailto:dirk.sutphin@state.co.us>> and local government designee, Debra Lening at kiowaclerk@hotmail.com <<mailto:kiowaclerk@hotmail.com>> follows:

1) Reporting of the presence of H₂S in concentrations less than 10 parts per million (PPM) shall be done via verbal and email notices. Verbal notice with a follow up email shall be provided as soon as practicable upon detection of H₂S to COGCC's area engineer and the local government designee.

2) All verbal and email notices shall include all of the following information:

- a) Well or Facility name,
- b) API Number or COGCC Facility Number,
- c) H₂S concentration in PPM,
- d) Date sample or measurement was collected,
- e) Type of measurement or analysis (e.g., gas analysis, meter measurement, or colorimetric tube), and
- f) Description of sample point.

3) Sundry Notices are required for H₂S concentrations equal to or exceeding 10 PPM. Only one H₂S Sundry Notice Form 4 is required per well or location following the initial H₂S detection, which exceeds 10 parts per million (PPM). Subsequent H₂S reporting shall be done on an annual basis and be submitted not later than January 31 for all measurements or sampling events during the prior calendar year.

4) Subsequent annual reports shall be provided in a spreadsheet and submitted to the COGCC's area engineer and/or COGCC's engineering supervisor via email.

5) Sundry Notices and annual report spreadsheets shall provide all of the following information:

- a) Well or Facility name
- b) API Number or COGCC Facility Number
- c) H₂S concentration in PPM

If you have any questions or concerns please feel free to contact me.

Thanks,

Arthur

Arthur W. Koepsell, P.G.

Oil & Gas Location Assessment Specialist
Southern Area

Oil and Gas Location Assessment
Colorado Oil and Gas Conservation Commission
1120 Lincoln St. Suite 801
Denver Colorado 80203
Phone (303) 894-2100 ext. 5148