

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, February 17, 2012 7:22 AM
To: Kubeczko, Dave
Subject: FW: Samson Resources Company, SE Bayfield 34-7 #12U-3A Pad , SWNW Sec 12 T34N R7W, La Plata County, Form 2A (#400223265) Review
Attachments: Multi_well_plan_2A.pdf
Categories: Orange - Operator Correspondence

Scan No 2034152 CORRESPONDENCE 2A#400223265

-----Original Message-----

From: tcorbett@frontier.net [<mailto:tcorbett@frontier.net>]
Sent: Friday, February 17, 2012 1:38 AM
To: Kubeczko, Dave
Cc: Myers, David; Mitchell, Georganne
Subject: Re: Samson Resources Company, SE Bayfield 34-7 #12U-3A Pad , SWNW Sec 12 T34N R7W, La Plata County, Form 2A (#400223265) Review

Dave,

Samson construction and drilling personal have reviewed the COA's and are agreeable to them. As we discussed, attached is the Multi-well plan that is needed to complete the required permit elements for the Form 2A. Please let me know if any other information is needed.

Thanks for your help,

Tim

Quoting "Kubeczko, Dave" <Dave.Kubeczko@state.co.us>:

> Tim,
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>
> I have been reviewing the SE Bayfield 34-7 #12U-3A Pad Form 2A
> (#400223265). COGCC would like to attach the following conditions of
> approval (COAs) based on the data Samson Resources has submitted on or
> attached to the Form 2A prior to passing the Oil and Gas Location
> Assessment (OGLA) review.
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>
> 1. Construction (Section 6): The box answering the question will
> salt (>15,000 ppm TDS Cl) or oil based muds (OBM) be used? has been
> marked Yes; therefore the following condition of approval (COA) will
> apply:
>
> COA 11 - A closed loop system must be implemented during drilling
> (which operator has indicated on the Form 2A); or, if a drilling pit
> is constructed, it must be lined. All cuttings generated during
> drilling with salt mud or OBM must be kept in the lined drilling pit,
> or placed either in containers or on a lined/bermed portion of the

> well pad; prior to offsite disposal. 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.
>
> 2. Water Resources (Section 14): Form 2A indicates the distance
> to the nearest surface water is 268 feet. COGCC guidelines require
> designating all locations within close proximity to surface water a
> sensitive area. The following conditions of approval (COAs) will apply:
>
>
> COA 4 - Location is in a sensitive area because of proximity to
> surface water; therefore, operator must ensure 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 or buried pipelines.
>
> 3. Water Resources (Section 14): Form 2A indicates the distance
> to the depth to groundwater to be 60 feet bgs for a water well located
> 1900 feet from the well pad. COGCC's review indicates that this water
> has a total depth of 60 feet bgs, with a depth to groundwater of 30
> feet bgs. COGCC has made this change.
>
> 4. General: The following condition of approval (COA) will apply:
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> COA 25 - If the wells are to be frac'd, flowback and stimulation
> fluids must be sent to tanks, separators, or other
> containment/filtering equipment before the fluids can be placed into
> any pipeline or pit located on the well pad or into tanker trucks for
> offsite disposal. The flowback and stimulation fluid tanks,
> separators, or other containment/filtering equipment 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.
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>
> 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.
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> Dave
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> P Please consider the environment before printing this e-mail
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