

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, March 26, 2012 10:16 AM
To: Kubeczko, Dave
Subject: Genesis Gas & Oil LLC, Fletcher Gulch 9-13 Pad, Lot 2 Sec 9 T1N R100W, Rio Blanco County, Form 2A #400221133 Review
Attachments: FG 9-13 Plat Packet FINAL.pdf; FG 9-13 3160-5 AAPD extension.pdf
Categories: Orange - Operator Correspondence

Scan No 2034258 CORRESPONDENCE 2A#400221133

From: Shari Myers [mailto:coloradokismet@yahoo.com]
Sent: Friday, February 17, 2012 3:28 PM
To: Kubeczko, Dave
Subject: Fw: Fwd: Genesis Gas & Oil LLC, Fletcher Gulch 9-13 Pad, Lot 2 Sec 9 T1N R100W, Rio Blanco County, Form 2A #400221133 Review

----- Forwarded Message -----

From: Shari Myers <coloradokismet@yahoo.com>
To: "dave.kubeczko@state.co.us" <dave.kubeczko@state.co.us>
Sent: Friday, February 17, 2012 2:11 PM
Subject: Fw: Fwd: Genesis Gas & Oil LLC, Fletcher Gulch 9-13 Pad, Lot 2 Sec 9 T1N R100W, Rio Blanco County, Form 2A #400221133 Review

Dave, your requests as follows:

- 1) Please see attached Exhibit set (Exhibit 2)
- 2) DRG is working on a Hydrology Exhibit for this location
- 3) reference area photo - I have contacted DRG to see what other pictures they have on file. The Cardinal Direction photographs included in the Exhibit set will not suit this purpose.
- 4) Please see attached Exhibit set (Exhibit 3)
- 5) Operator concurs with COGCC COA's 23, 5, 25, and 38

Additionally, the same Lease Stipulation applies (WR 32); and the BLM COA's are attached

Thanks
Shari

----- Forwarded Message -----

From: Robert Behner <bbehner@genesisgo.com>
To: Sheryl Myers <coloradokismet@yahoo.com>
Sent: Tuesday, February 7, 2012 10:08 PM
Subject: Fwd: Genesis Gas & Oil LLC, Fletcher Gulch 9-13 Pad, Lot 2 Sec 9 T1N R100W, Rio Blanco County, Form 2A #400221133 Review

Best regards,

Bob

Robert C. Behner
Genesis Gas & Oil LLC
1701 Walnut St., 4th Floor
Kansas City, MO 64108
816.222.7500 Phone
816.222.7501 Fax
816.582.3131 Mobile

Begin forwarded message:

From: "Kubeczko, Dave" <Dave.Kubeczko@state.co.us>
Date: February 7, 2012 6:57:30 PM CST
To: Robert Behner <bbehner@genesisco.com>
Subject: Genesis Gas & Oil LLC, Fletcher Gulch 9-13 Pad, Lot 2 Sec 9 T1N R100W, Rio Blanco County, Form 2A #400221133 Review

Robert,

I have been reviewing the Fletcher Gulch 9-13 Pad **Form 2A** (#400221133). COGCC requests the following clarifications regarding the data Genesis Gas & Oil has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, COGCC would like to attach the following conditions of approval (COAs) to the Form 2A.

1. **Rule 303.d.(3).C.:** The Construction Layout Drawing does not show the location of the proposed gas and water pipelines. The anticipated/proposed locations of these pipelines should be shown on a drawing. Otherwise, a statement indicating that the proposed pipeline locations will follow the access road in the comments section would be sufficient. I can make the change if you send an email with this request.
2. **Rule 303.d.(3).D.:** A topographic map showing all surface waters and riparian areas within one thousand (1,000) feet of the proposed oil and gas location, with a horizontal distance and approximate bearing from the oil and gas location. The Hydrology Map provided has a radius distance of 1-mile, not 1000 feet, is not legible, is not set up at an appropriate scale, and does not show distance or bearing to the nearest surface water. A revised Hydrology Map is required.
3. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference area needs to be indicated on a topographic map and four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (01/20/2012). Another option would be to select a reference area immediately adjacent to the well pad location in one of the four cardinal directions and the following statement can be added to the **Section 15. Comments:** The reference area is located immediately adjacent to the well pad to the north on undisturbed land. However, the vegetation must be visible from the attached Location Pictures. I can make the change if you send me an email with this request.
4. **Rule 303.d.(3).H.:** If the oil and gas location disturbance is to occur on lands with a slope ten percent (10%) or greater, or one (1) foot of elevation gain or more in ten (10) foot distance, then the following shall be required: i. Construction layout drawing (construction and operation); and ii. Location cross-section plot (construction and operation). The Construction Layout Drawing provided (Fletcher Gulch #9-34) is not for this location. Please provided the correct Construction Layout Drawings that show the dimensions and layout of the well pad. Cross-sections are also needed.

5. **General:** In addition, the following conditions of approval (COAs) will also apply:
- 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, 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 or buried permanent pipelines.
- COA 25** - If the well is 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.
- 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, if drill cuttings are to remain/disposed of onsite, they must also meet the applicable standards of table 910-1.

COGCC would appreciate your concurrence with attaching these COAs (item 5) to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 2, 3, and 4) also need to be addressed prior to permit approval. In addition, could Genesis Gas & Oil provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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