

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, April 09, 2012 1:40 PM
To: Kubeczko, Dave
Subject: FW: Wellstar Corporation, Three Rivers Unit, 41-27H Pad, NENE Sec 27 T8N R78W, Jackson County, Form 2A #400255793 Review
Attachments: Terry L Hoffman.vcf
Categories: Orange - Operator Correspondence

Scan No 2034303 CORRESPONDENCE 2A#400255793

From: Terry Hoffman [mailto:terry@rockymountainpermitting.com]
Sent: Monday, April 09, 2012 1:04 PM
To: Kubeczko, Dave
Subject: RE: Wellstar Corporation, Three Rivers Unit, 41-27H Pad, NENE Sec 27 T8N R78W, Jackson County, Form 2A #400255793 Review

I have spoken with the Operator and they are willing to accept the BMP's as proposed by the COGCC.

Thank you,

Terry L. Hoffman



From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, April 05, 2012 3:37 PM
To: Terry Hoffman
Subject: FW: Wellstar Corporation, Three Rivers Unit, 41-27H Pad, NENE Sec 27 T8N R78W, Jackson County, Form 2A #400255793 Review
Importance: High

Terry,

I revised the email slightly (see yellow and black highlighted text). Thanks.

Dave

From: Kubeczko, Dave
Sent: Thursday, April 05, 2012 1:23 PM
To: 'terry@rockymountainpermitting.com'
Subject: Wellstar Corporation, Three Rivers Unit, 41-27H Pad, NENE Sec 27 T8N R78W, Jackson County, Form 2A

Importance: High

Terry,

I have been reviewing the Three Rivers Unit, 41-27H Pad **Form 2A** (#400255793). COGCC will attach the following conditions of approval (COAs) based on the data Wellstar Corporation 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 distance to the nearest surface water is 600 feet. COGCC guidelines require designating all locations with close proximity to surface water a **sensitive area** and requiring the following conditions of approval (COAs):
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids (excluding freshwater) 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.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 15 feet bgs for a well located 1942 feet away from the proposed pad. COGCC guidelines require designating all locations with **shallow groundwater** close proximity to surface water a **sensitive area** and requiring the following condition of approval (COA) will apply:
 - COA 1** - Location is in a sensitive area due to very shallow groundwater; therefore, either a closed loop system must be used, or the drilling pit must be lined and constructed above the top of groundwater.
3. **General:** The following conditions of approval (COAs) will also apply:
 - COA 25** - If the wells are to be hydraulically stimulated, 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, the drill cuttings must also meet the applicable standards of table 910-1.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

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.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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