

**From:** Koepsell, Arthur  
**To:** "[bhedberg@nrgcolo.com](mailto:bhedberg@nrgcolo.com)"  
**Subject:** Jenny C 1 form 2A Document # 400261755, Natural Resources Group  
**Date:** Tuesday, May 08, 2012 7:57:00 AM

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Brian,

The COGCC is reviewing the Form 2A (#400261755) for the Natural Resources Group Jenny C 1 location, located in the NWNW Sec 36 T26S R67W Huerfano County, Colorado. The COGCC requests the following changes to the information provided and acknowledgement of conditions of approval prior to passing the Oil and Gas Location Assessment (OGLA).

#### Location Drawing

A review of aerial photos indicate that there is a road and the terminus of a canal within 400 feet of the propose location. Please provide an updated drawing showing the two improvements within 400 feet of the location. The four hundred feet should be from the outside of the maximum pad size stated in the Form 2A.

#### Construction Layout Drawings

The proposed pit should be shown in the cross section view of the pad. Please provide updated drawings including the pit in cross section view.

#### Depth to Groundwater

The stated depth to water is 14 feet. At this depth to groundwater the location will be considered a sensitive area, the pit will be required to be lined and cuttings disposed of offsite. If you believe the depth to water is greater than 14 feet please provide the calculations/reasons to support your stated depth.

#### Land Use

Based on a review of aerial photos available on the COGCC website it appears that the current land use around the location is rangeland. The current and future land uses on the form 2a should be amended to range land.

#### Reference area and reference photos

Because the location is on range land reference area photos are required.

#### Conditions of Approval

- Location is in a sensitive area because of shallow groundwater; therefore, either a lined drilling pit or closed loop system is required.

- Location is in a sensitive area due to shallow groundwater; therefore the operator must provide a waste management plan for approval. The waste management plan should be submitted to Peter Gintautas at [Peter.Gintautas@state.co.us](mailto:Peter.Gintautas@state.co.us). The plan should include how drilling waste will be disposed of.

Please feel free to contact me if you have any questions or concerns

Thanks,

Arthur

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