

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, July 13, 2012 11:40 AM
To: Kubeczko, Dave
Subject: FW: IGE 114
Attachments: Plat.pdf; COA.docx; Diretional plan.pdf; Form 2.pdf; IGE 114 Water Well Test Release 6-25-12.xls; laplata_lpc_web_server467647801440.jpg

Scan No 2034449

CORRESPONDENCE

2A#400272243

From: Terry Lindeman [mailto:TLindeman@elmridge.net]
Sent: Friday, July 06, 2012 1:21 PM
To: Kubeczko, Dave
Subject: IGE 114

Dave,

I reviewed the COA's, and as we discussed on the phone we will used a closed system for drilling. I hope the attached info is what you needed if not please let me know.

Thanks for the help,
Terry Lindeman

From: Kubeczko, Dave
Sent: Thursday, June 07, 2012 2:54 PM
To: 'tlindeman@elmridge.net'
Subject: Elm Ridge Exploration Company, IGE 114 Pad , NWSW Sec 18 T33N R7W, La Plata County, Form 2A (#400272243) Review

Terry,

I have been reviewing the IGE 114 Pad **Form 2A** (#400272243). COGCC would like to attach the following conditions of approval (COAs) based on the data Elm Ridge Exploration 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 475 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.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the depth to groundwater to be 200 feet bgs for a water well located 1750 feet from the well pad. COGCC's review indicates that this water well (Permit No.

257628 - - Lee Ezra, domestic well) has a total depth of 200 feet bgs, a depth to groundwater of 40 feet bgs, and a pumping rate of 5 gpm. COGCC has made this change.

3. **Rule 303.d.(3).I.:** Where the proposed oil and gas location is for multiple wells on a single pad, a drawing showing proposed wellbore trajectory with bottom-hole locations. Please provided a Multi-Well Plan that shows the locations of both surface holes and bottom holes.
4. **General:** The following condition of approval (COA) will apply:
 - COA 7** - There is the potential for shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
 - 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 26** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us), the COGCC Field Inspection Supervisor for Southern Colorado (Mike Leonard; email mike.leonard@state.co.us), and the COGCC Field Inspector for La Plata County (Steve Labowskie; email steve.labowskie@state.co.us) 48 hours prior to start of pad construction, pit liner installation (if applicable), rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).
 - 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.

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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