

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, June 11, 2013 10:33 AM
To: dave.kubeczko@state.co.us
Subject: FW: Fram Operating LLC, Hamilton 33-3-A Pad, Lot 4 (NWNW) Sec 33 T13S R95W, Delta County, Form 2A (#400402470) Review

Categories: Operator Correspondence

Scan No 2106631 CORRESPONDENCE 2A#400402470

From: Dave [mailto:dave@framamericas.com]
Sent: Tuesday, June 11, 2013 10:27 AM
To: 'Dave Kubeczko - DNR'
Subject: RE: Fram Operating LLC, Hamilton 33-3-A Pad, Lot 4 (NWNW) Sec 33 T13S R95W, Delta County, Form 2A (#400402470) Review

Looks good. Thanks.

Fram Operating LLC
David A. Cook, Manager
30 E Pikes Peak Ave Ste 287
Colorado Springs, CO 80903
(719) 355-1320

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From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Sunday, June 09, 2013 6:02 PM
To: dave@framamericas.com
Subject: Fram Operating LLC, Hamilton 33-3-A Pad, Lot 4 (NWNW) Sec 33 T13S R95W, Delta County, Form 2A (#400402470) Review

David,

I have been reviewing the Hamilton 33-3-A Pad **Form 2A** (#400402470). COGCC would like to attach the following conditions of approval (COAs) based on the data Fram Operating LLC has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

General: The following previously attached conditions of approval (COAs) will apply:

COA 91 - Notify the COGCC 48 hours prior to start of pad construction, 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 9 - Reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system must be implemented during drilling.

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 23 - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Proposed BMPs attachment and stated in the BMP tab of the Form 2A); 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 38 - The moisture content of any 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 the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

COA 25 - If the well is to be hydraulically stimulated, then flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

Groundwater Baseline Sampling: Since this well is considered to be a wildcat/exploratory well, the following COA will also apply:

COA 9 - Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, can Fram Operating please confirm/concur the following comment from CPW that was received by COGCC on 06-05-13:

"CPW, Operator, Delta County LGD, COGCC, and surface owner conducted an onsite inspection of the location on 5/21/2013. CPW is currently in negotiations with the operator on a comprehensive Wildlife Mitigation Plan (WMP) to address development impacts to wildlife and wildlife habitat. The operator has agreed to include this facility in the WMP. Those measures that are agreed upon in the WMP may apply to this facility upon completion of the WMP."

If you have any questions, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email. Thanks.

Dave

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

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