



STATE OF  
COLORADO

Young - DNR, Rob <rob.young@state.co.us>

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## FW: Rudnik B-4 inspection and request for pit closure documentation - facility ID # 235350 - Document #67371608

1 message

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**Dave Weinert** <davew@kirkwoodcompanies.com>  
To: "rob.young@state.co.us" <rob.young@state.co.us>

Fri, Apr 29, 2016 at 11:11 AM

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**From:** Dave Weinert  
**Sent:** Tuesday, March 18, 2014 3:37 PM  
**To:** susan.sherman@state.co.us  
**Cc:** Bob Kirkwood; Brian Meidinger; Scott Kerr  
**Subject:** Rudnik B-4 inspection and request for pit closure documentation - facility ID # 235350 - Document #67371608

Susan;

This email is written in response to your request in the above referenced document to "Send pit closure documentation to COGCC EPS".

The pit closure documentation has been muddied by the passage of many years since the pits at this location were closed. The following provides our best chronology of the pits and pit closure at the above referenced facility.

- 1966 – well completed
- 1971 – application for earthen pit submitted to COGCC (enclosed as attachment #1). The application was not approved.
- June, 1973 – COGCC inspection memo from C.G. McDowell to D.V. Rogers (enclosed as attachment #2). Note at bottom of memo states "5/21/74 – Visited, gets, Pits graded over and filled in. Lease injecting at Kirkwood-Joeckel 43-27, NE SE 27-3S-51W"
- August, 1978 – letter from COGCC to W.C. Kirkwood requesting submittal of a pit permit (enclosed as attachment #3).
- February, 1979 – letter from William Vandeventer at William C. Kirkwood to COGCC (enclosed as attached #4) stating "all produced water from these wells is being injected into the Kirkwood operated Rudnik 32-27" and continuing "Water injection was initiated on May 25, 1973, and has continued since that time."

The above documents provide a picture of production pits that were in use at this location for approximately seven years and were then closed in accordance with then current COGCC rules.

- 1984-1989 - Beginning with inspection reports dated 5-21-84 and continuing through 6-22-89 , a series of five COGCC inspection reports (enclosed as attachment #5) appears to indicate that one or two small pits were present at the location. These pits are variously described as "5'X5'", "4'X10'" and "15X15". The pits are also described as "clean" and "pit empty – probably using common injection well" and "not cvd empty clean" and "weed filled fenced". The pit(s) must have been constructed after the production pits were closed and likely were only used for an emergency blow down of the treater. The inspection reports do not indicate the pit(s) in use.
- 1993-1995 – Two COGCC inspection reports dated 1-22-1993 and September 18, 1995 (enclosed as attachment #6) do not indicate that any pits are present at the location. The pit(s) likely were closed between 1989 and 1993.

The attached (attachment #7) "Rules and Policies Approved between 1990 and 2008" table indicates that the 900 series rules that govern the closure requirements for pits was not approved until 1995.

As a result of the above documentation, Wesco requests that the COGCC consider all pits at the location as closed in accordance with then in place regulations.

If you have any questions or require further information, please feel free to contact me.

Thanks,

Dave

Dave Weinert

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**7 attachments**

 **attachment #1.pdf**  
159K

 **attachment #2.pdf**  
38K

 **attachment #3.pdf**  
62K

 **attachment #4.pdf**  
50K

 **attachment #5.pdf**  
279K

 **attachment #6.pdf**  
159K

 **attachment #7.pdf**  
136K