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**To:** ["lspermitco@aol.com"](mailto:lspermitco@aol.com)  
**Subject:** Pathfinder C 11- 12 1 Form 2A 400274302, Aus-Tex Exploration  
**Date:** Tuesday, April 24, 2012 8:45:00 AM  
**Attachments:** [Example Managment plan.pdf](#)

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Lisa,

The COGCC is reviewing the Form 2A (#400274234) for the Aus-Tex Exploration Pathfinder C 11- 12 1 location, located in the NWNW Sec 12 T20S R70W Fremont County, Colorado. The COGCC requests approval of the following changes and recognition of the conditions of approval prior to passing the Oil and Gas Location Assessment (OGLA).

#### Depth to Groundwater

A review water wells in the vicinity of the Pathfinder C 11- 12 1 location indicate that water levels in the area are approximately 98 feet (Water Well Permit # 19890). The form 2A will need to be amended from 159 feet to 134 feet. I would like to remind you that the COGCC is requesting the depth to groundwater not the depth of the water well.

#### Distance to Surface Water

The closest surface water appears to be 230 feet North West of the location (Based on the attached hydrology map). The Distance to Surface water on form 2A should be amended to 230 feet.

#### Sensitive Area Determination

Based on the close proximity of a municipal water supply well and surface water the area is considered a sensitive area.

#### Conditions of approval

Due the close proximity of surface water the following COA will apply:

- Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect intermittent stream located 230 feet east of the staked oil and gas location from a release of drilling, completion, produced fluids, and chemical products.

Due to the location being in a sensitive area the following conditions of approval will apply:

- Due to the likely hood of oil being received in the pit and exceeding 10,000 ppm TPH the drilling pit must be lined Fenced and netted. The pit will be closed through the form 27 process.

- Due to the likely hood of oil being received in the pit and exceeding 10,000 ppm TPH an approved Pit Permit (Form 15) will be required prior to pit construction. The form 15 shall include a pit management plan.

In the COGCC's experience with drilling Operations in the area of Pathfinder C 14-01 1 has been that oil seeps out of cuttings in drilling pits and will need to be managed by the operator to ensure compliance with 900 series rules. The proposed drilling pit for the location will require that a form 15 be submitted to the COGCC prior to construction. In the past we have approved the pits as a dual purpose drilling and skim pit which will allow the operator to better manage the oil. Along with the Form 15 a pit management plan will be required prior to passing the OGLA review.

The pit management plan will address how the operator will handle the oily cuttings and free oil in the pit. The plan should also include how the operator intends to dispose of the pit contents and close the pit. I have included an example of a pit management plan that was submitted to the COGCC for you reference only.

Please feel free to contact me if you any questions.

Thanks,

Arthur

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