

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, January 12, 2010 3:31 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT Savage RMV 76-27, NWSE Sec 27 T6S R94W, Garfield County, Form 2A (#1774662) Review

Scan No 2032749 CORRESPONDENCE 2A#1774662

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Thursday, January 07, 2010 2:44 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT Savage RMV 76-27, NWSE Sec 27 T6S R94W, Garfield County, Form 2A (#1774662) Review

From: Mestas, April
Sent: Thursday, January 07, 2010 2:02 PM
To: Davis, Gregory
Subject: FW: Williams Production RMT Savage RMV 76-27, NWSE Sec 27 T6S R94W, Garfield County, Form 2A (#1774662) Review

Hi Greg,

We've added our comments below. All COAs appear to be fine. Dan is going to work on getting the plats revised to show the facilities. Thanks!

April

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, January 06, 2010 11:13 AM
To: Davis, Gregory
Subject: Williams Production RMT Savage RMV 76-27, NWSE Sec 27 T6S R94W, Garfield County, Form 2A (#1774662) Review

Greg,

I have been reviewing the Savage RMV 76-27 **Form 2A** (#1774662). COGCC requests the following clarifications regarding the data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The estimated post-construction ground elevation of 5089 feet msl, is approximately 170 feet lower than the current ground elevation of 5259 feet msl. If you can confirm what the post-construction elevation will be, I can make the change if you send an email with this request. **Greg- It looks like the elevation is actually 5259. Not sure where they got 5089 - maybe a typo?**
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface (i.e., the Colorado River) is 171 feet. Form 2A also indicates the depth to groundwater to be 19 feet bgs for a well located 1070 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 51469-F-Guyer, domestic well) to the northeast, with a total depth of 50 feet bgs, a depth to groundwater of 19 feet bgs, and a pumping rate of 9.5 gpm. I believe this is the well you located. However, there is another well that may be closer (Permit No. 23102-F-Savage, domestic/stock well), located 334 feet to the north-northwest, with no information available.

COGCC guidelines require designating all locations within ¼ mile of the Colorado River, with shallow groundwater (i.e., less than 20 feet bgs), and/or within 1/8 of a mile of a domestic water well 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 and a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. **This is covered by our stormwater as well as the SPCC controls and plans. This COA is ok**

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

– This is our usual practice – this COA is ok

COA 7 - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented. **-We use closed loop systems so this COA is ok**

COA 8 - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined. **– we don't have production pits so this COA is ok**

3. **Rule 303.d.(3).C.:** The scaled construction layout drawing (Plat 2) does not show the location of the proposed separators, or gas, oil, and water pipelines (2). This drawing should show the anticipated locations of these new facilities. In addition, a scaled location drawing showing all visible improvements (pipelines, etc.) within 400 feet from the edge of surface disturbance needs to be included. **Dan – can you take care of this one?**
4. **Rule 1202.c.(2).:** Site-specific and species-specific factors of the proposed new oil and gas location: Based on Williams' discussion with CDOW, the following wildlife BMP, which was offered by Williams and agreed to by CDOW, needs to be submitted as a separate attachment to the Form 2A;
Clarification for previously submitted site-specific BMP – Implement self imposed timing limitations to protect species and/or habitat. This BMP is in reference to the bald eagle nest site within ½ mile of the well pad. The self imposed timing limitation will extend from January through the end of June. **Please see attached for the BMP from Kent.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues are necessary before I can pass this permit. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

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

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