



DEPARTMENT OF NATURAL RESOURCES

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February 8, 2010

Mr. John Suchar
Environmental Specialist
Williams Production R.M.T.
Parachute, CO 81635

Re: Request for Approval of Site Investigation and Remediation Workplans
Federal RGU31-24-198 Well Pad Fire, Frac and Reserve Pits
NWNE Sec. 24 1S 98W
Rio Blanco County, Colorado
COGCC Remediation No.s 4898 and 4899

Dear Mr. Suchar,

Thank you for submitting Form 27 Site Investigation and Remediation Workplans as I requested for the reserve and frac pits involved in the January 12, 2010 fire on well pad Federal RGU31-24-198. Colorado Oil and Gas Conservation Commission (COGCC) staff has reviewed the Form 27s submitted on February 5, 2010 for the referenced site.

The "Cause of Condition Being Investigated and Remediated" is marked on the Form 27s as "Pit closure". The cause should be revised to "Other: reserve pit fire damage", or "Other: frac pit fire damage". It is also noted that this location may be in a sensitive area as wells nearby indicate the depth to groundwater is from 16-25 feet below ground surface (bgs). The "Technical Conditions" sections of these forms need to be revised, and a sensitive area determination evaluation must be attached.

As discussed previously, the Form 27s must outline a site investigation at each pit robust enough to completely investigate threatened releases from the pits. The Form 27s must be approved and the investigation completed and reviewed by the COGCC prior to liner replacement and reuse of the pits.

The quantity and location of proposed samples must be adequate to demonstrate whether or not a release has occurred. The proposed sampling program must include:

- The proposed minimum number and locations of samples to be collected at routine intervals along each wall of each pit, both above and below the burn line.

- A proposed sample from the low point along the burn line on each pit wall. The exact location of these samples to be determined in the field.
- Additional proposed samples must be collected where the liners are torn, crumpled and otherwise in poor condition or potentially compromised. The exact location of these samples to be determined in the field. Visual and field screening observations can guide additional sampling to adequately define the extent of potentially impacted soils.
- The location in the reserve pit where the “small amount of condensate”....”was forced against the back wall of the pit by the gas velocity” (per your email on 1/25/2010) must also be a proposed sample location.
- Proposed sample locations from the base of the pits, including at their lowest points.
- Proposed soil samples to be collected beneath the area of the burned liner underlying the flowback tanks and where condensate was released and subsequently channeled to the pit by the surrounding berms.
- Field screening results may be used to guide sampling, but screening results must be confirmed with sample analysis conducted by a certified laboratory.
- Unique soil samples (not composited samples) shall be submitted with unique sample identification numbers to a certified laboratory for analysis.
- Photo documentation of the locations chosen for sample collection, with identifiable landmarks included in the photos (such as low point of liner burn line, pit rim, pad level, flowback tanks, etc), as well as close-ups of sample locations and collection. Clearly label each photo within the photo, utilizing a dry-erase board or similar, while not interfering with the object of the photograph.
- GPS coordinates for each sample location would be ideal.

The COGCC does not approve the Form 27 workplans as submitted. The Form 27s submitted for these two pits did not include the information above, thus are deemed inadequate. Revise the Form 27s and attach detailed site investigation plans; site diagrams at an appropriate scale to allow adequate depiction of the pits and proposed sampling locations, with appropriate identifiers; and the analytical suite proposed for the sample analysis.

Submit the revised Form 27s for my approval within 30-days from the date of this letter.

Additionally, it is noted that the reserve and frac pits appear to have been used as multi-well pits previously. Based on your description of future pit use, they will be multi-well pits, thus need to be properly permitted via a Form 15. The Form 15 will need to be completed and approved before these pits can be re-used for future drilling activities.

If you require any additional information, please call me at 970-625-2497.

Regards,



Linda Spry O'Rourke
Environmental Protection Specialist II

Cc: Dave Neslin – COGCC Director
Debbie Baldwin – COGCC Environmental Manager
Alex Fischer – COGCC Environmental Supervisor
Chris Canfield – COGCC NW Environmental Protection Specialist II, NW Region