

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Friday, February 26, 2010 1:25 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, W43-28, NENW Sec 28 T6S R95W, Garfield County, Form 2A #2094675 Review

Scan No 2032890      CORRESPONDENCE      2A#2094675

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**From:** Harris, Howard [mailto:Howard.Harris@Williams.com]  
**Sent:** Friday, February 19, 2010 9:55 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT, W43-28, NENW Sec 28 T6S R95W, Garfield County, Form 2A #2094675 Review

Dave

We have no problem with attaching the COA's to the form 2A. We have BMP's, and procedures all ready in place that are more than adequate to handle the requirements.

Howard Harris  
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Williams Production RMT  
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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, February 08, 2010 8:13 AM  
**To:** Harris, Howard  
**Subject:** Williams Production RMT, W43-28, NENW Sec 28 T6S R95W, Garfield County, Form 2A #2094675 Review

Howard,

I have been reviewing the W43-28 (#2094675) **Form 2A**. 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. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 120 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):
  - COA 4** - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
2. **General:** Due to the potentially permeable nature of the surface materials in this area, the following condition of approval (COA) will apply:
  - COA 38** - The moisture content of any drill 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, the drill cuttings must also meet the applicable standards of table 910-1.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed. 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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