

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, March 08, 2010 10:27 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Chevron TR 21-36-597 PAD, NENW Sec 36 T5S R97W, Garfield County, Form 2A #2094983 Review

Scan No 2032928

CORRESPONDENCE

2A#2094983

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**From:** Head, Jennifer [mailto:Jennifer.Head@williams.com]  
**Sent:** Wednesday, February 24, 2010 12:20 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT, Chevron TR 21-36-597 PAD, NENW Sec 36 T5S R97W, Garfield County, Form 2A #2094983 Review

Williams concurs with these proposed COAs.

Jennifer Head  
Williams Production RMT Co.  
Direct 303-606-4342  
Mobile 970-218-3512

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Wednesday, February 24, 2010 12:04 PM  
**To:** Head, Jennifer  
**Subject:** Williams Production RMT, Chevron TR 21-36-597 PAD, NENW Sec 36 T5S R97W, Garfield County, Form 2A #2094983 Review

Jennifer,

I have been reviewing the Chevron TR 21-36-597 PAD **Form 2A** (#2094983). 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 342 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. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 20 feet bgs for a well located 6389 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater (i.e., less than 20 feet), a **sensitive area**. The following condition of approval (COA) will apply:  
**COA 1** - Location is in a sensitive area because of shallow groundwater; therefore, either a lined drilling pit or closed loop system must be implemented.
3. **General:** COGCC's review indicates that the well pad location is approximately 8184 feet from the current eastern edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:  
**COA 9** - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.

**COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

**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.

**COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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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