

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, March 16, 2010 7:01 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Federal SG 23-29, SESW Sec 29 T7S R96W, Garfield County, Form 2A (#400034958) Review  
**Attachments:** SG 23-29\_POD.PDF

Scan No 2032949      CORRESPONDENCE      2A#400034958

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**From:** Davis, Gregory [mailto:Gregory.Davis@Williams.com]  
**Sent:** Monday, March 08, 2010 1:58 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT, Federal SG 23-29, SESW Sec 29 T7S R96W, Garfield County, Form 2A (#400034958) Review

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Wednesday, March 03, 2010 11:57 AM  
**To:** Davis, Gregory  
**Subject:** Williams Production RMT, Federal SG 23-29, SESW Sec 29 T7S R96W, Garfield County, Form 2A (#400034958) Review

Greg,

I have been reviewing the Federal SG 23-29 **Form 2A** (#400034958). 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 (OGLA).

1. **Facilities (Section 5):** The Form 2A Construction layout drawing (Plat #2) indicates that there will be a separate flare pit located along the southeastern edge of the well pad. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) needs to be submitted. I can make the change if you send an email with this request. **Form 15 will be filed. Flare Pit can be marked as special purpose pit.**
2. **Construction (Section 6):** The ground elevation of 5089 is approximately 294 feet lower than the estimated post-construction ground elevation of 5383 feet msl. Based on the construction layout drawing, I believe the correct elevation should be 5389 feet msl. I can make the change if you send an email with this request.  
**Ungraded Ground Elevation is incorrect on the 2A. Should be 5383'**
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 153 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. **Will comply.**  
**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.  
**Best Management Practices submitted with the 2A cover this COA.**
4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 6 feet bgs for a well located 7567 feet away from the existing well pad. COGCC's review found two water wells, one (Permit No. 258441-A-K&H leasing, commercial well) located approximately 7972 feet to the southwest, with a total depth of 100 feet bgs and a depth to groundwater of 45 feet bgs; the other (Permit No. 225414-Glenn Springs Holdings,

monitoring well) located approximately 10930 feet to the northeast, with a total depth of 98 feet bgs and a depth to groundwater of approximately 58 feet bgs. I believe these two water wells are more indicative of groundwater conditions at this well pad location. I can make the change if you send an email with this request.

**Please make this change**

5. **Rule 303.d.(3).C.:** Neither the scaled construction layout drawing (Plat 2) nor the location drawing (Plat 6) show the location of the gas, oil, or water pipelines. One of these drawings should show the existing/anticipated location of the pipelines. **Please see attached POD Map.**

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