

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 13, 2010 1:42 PM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, GGU Miller Fed (MDP #6 Pad) 33A-32-691, SESW Sec 32 T6S R91W, Garfield County, Form 2A (#2585800) Review

Scan No 2033075 CORRESPONDENCE 2A#2585800

From: Matt Barber [mailto:mbarber@billbarrettcorp.com]
Sent: Tuesday, April 13, 2010 12:47 PM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, GGU Miller Fed (MDP #6 Pad) 33A-32-691, SESW Sec 32 T6S R91W, Garfield County, Form 2A (#2585800) Review

Dave,

Indicated below in blue text are Bill Barrett Corp's response/concurrences to these COAs.

Please let me know if you have any questions or need any additional information.

Thank you,

Matt

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, April 06, 2010 6:40 PM
To: Matt Barber
Subject: Bill Barrett Corp, GGU Miller Fed (MDP #6 Pad) 33A-32-691, SESW Sec 32 T6S R91W, Garfield County, Form 2A (#2585800) Review

Matt,

I have been reviewing the GGU Miller Fed (MDP #6 Pad) 33A-32-691 **Form 2A** (#2585800). COGCC requests the following clarifications regarding the data Bill Barrett Corp has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** The construction layout drawings (Sheet 4 of 12) indicate that there will be a separate flare pit located west-northwest of the reserve pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request. **BBC Response: BBC will not construct the flare pit indicated on the construction layout drawings (sheet 4 of 12).**
2. **Facilities (Section 4):** Since 30 (500 bbls) temporary frac tanks will be onsite, the following condition of approval (COA) will apply:
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. **BBC Response: Agreed**
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 125 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) 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; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. **BBC Response: Agreed**

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids. **BBC Response: Agreed**

4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 18 feet bgs for a well located 2975 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater (i.e., less than 20 feet bgs) a **sensitive area**. The following condition of approval (COA) will apply:

COA 7 - Location is in a sensitive area because of shallow groundwater (18' bgs); therefore either a lined drilling pit or closed loop system must be implemented. **BBC Response: Agreed**

COA 6 - All pits must be lined. **BBC Response: Agreed**

5. **General:** The following condition of approval (COA) will also 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. **BBC Response: Agreed**

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