

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, May 12, 2010 8:07 AM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Knuckles 2-11-39-18, NWNE Sec 11 T39N R18W, Dolores County, Form 2A (#400053922) Review

Scan No 2033106 CORRESPONDENCE 2A#400053922

From: Tracey Fallang [mailto:tfallang@billbarrettcorp.com]
Sent: Friday, April 30, 2010 8:22 AM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, Knuckles 2-11-39-18, NWNE Sec 11 T39N R18W, Dolores County, Form 2A (#400053922) Review

Dave, in response to your e-mail:

1. Yes; it is ok for you to indicate the flare pit as a special purpose pit on the Form 2A. I am aware of the requirement to fill out a Form 15 and will do so prior to construction. I don't send them right away as we rarely construct them and in working with Karen Spray, we wait until we get closer to drilling as this area is still so exploratory.
2. Yes; it is ok for you to make this change.
3. COA 6 – BBC lines pits according to the 900 Series rules. Because this reserve pit does have construction in fill, we line them according 902.f.
COA 23 – OK
COA 38 – OK

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, April 29, 2010 4:55 PM
To: Tracey Fallang
Subject: Bill Barrett Corp, Knuckles 2-11-39-18, NWNE Sec 11 T39N R18W, Dolores County, Form 2A (#400053922) Review

Tracey,

I have been reviewing the Knuckles 2-11-39-18 **Form 2A** (#400053922). COGCC requests the following clarifications regarding the data Bill Barrett 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 (Figure 1) indicate that there will be a separate flare pit located southwest 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.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 170 feet bgs for a water well located 9000 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 75831-Johnson, domestic/stock well) located approximately 6652 feet (1.26 miles) to the southeast, with a total depth of 140 feet bgs, a depth to groundwater of 67 feet bgs, and a pumping rate of 2 gpm. I believe this well is indicative of groundwater conditions in this area. I can make the change if you send an email with this request.
3. **General:** Due to the potentially permeable nature of the surface material and the underlying bedrock in this area, the following conditions of approval (COAs) will apply:
COA 6 - Reserve pit must be lined or closed loop system must be implemented during drilling.

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.

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 prior to permit approval. 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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