

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 25, 2010 11:02 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Bill Barrett Corp, GGU Fed (MDP Pad #15) 34D-29-691, NWSE Sec 29 T6S R91W, Garfield County, Form 2A (#400056347) Review

Scan No 2033151      CORRESPONDENCE      2A#400056347

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**From:** Tracey Fallang [mailto:tfallang@billbarrettcorp.com]  
**Sent:** Friday, May 14, 2010 9:36 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Bill Barrett Corp, GGU Fed (MDP Pad #15) 34D-29-691, NWSE Sec 29 T6S R91W, Garfield County, Form 2A (#400056347) Review

Dave, in response to your requested clarifications below:

1. **COA 23:** COGCC Rule 604(a)(4) rules already require berms or secondary containment devices to be constructed around oil, condensate and produced water tanks.  
Therefore, BBC will adhere as required.
2. Can you please provide us with a copy of your "COGCC guidelines" for determining a sensitive area? I'd like to have a better understanding of what you are using for making these determinations.  
**COA 4:** This is already required above in COA 23.  
**COA 5 – OK**
3. Yes, make the change.
4. **COA 6 and COA 38:** OK

**Subject:** Bill Barrett Corp, GGU Fed (MDP Pad #15) 34D-29-691, NWSE Sec 29 T6S R91W, Garfield County, Form 2A (#400056347) Review

Tracey,

I have been reviewing the GGU Fed (MDP Pad #15) 34D-29-691 **Form 2A** (#4000 56347). 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 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.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 342 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.  
**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 128 feet bgs for a well located 1363 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 203138-Swanson, domestic/stock well) to the north-northeast, with a total depth of 128 feet bgs, a depth to

groundwater of 18 feet bgs, and a pumping rate of 3.5 gpm. I believe this is the well you located. The number that comes up on our GIS map is 128 feet (this number often pertains to the total depth of the well, not the depth to groundwater). In addition, the Hydrology Map also indicates that the depth to groundwater is 18 feet for this well (based on elevation differences and proximity to surface water, the estimated depth to groundwater at the proposed well pad is probably deeper than 20 feet bgs; therefore, this location would not be considered a sensitive area). I can make the change if you send me an email with this request.

4. **General:** The following condition of approval (COA) will also apply:

**COA 6** - Reserve pit must be lined or closed loop system must be implemented during drilling.

**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 issue also needs 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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