

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, August 11, 2010 6:26 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Bill Barrett Corp, Kaufman Pad #6 21A-24-692, SWNE Sec 24 T6S R92W, Garfield County, Form 2A (#400074759) Review

Scan No 2033295      CORRESPONDENCE      2A#400074759

Received verbal concurrence of COAs 4, 5, 6, 9 23, 38 from Bill Barrett on August 11, 2010. Confirmed that all pits would be constructed in cut only, therefore COA 39 is not applicable.

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**From:** Elaine Winick [mailto:EWinick@billbarrettcorp.com]  
**Sent:** Monday, July 19, 2010 8:18 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Bill Barrett Corp, Kaufman Pad #6 21A-24-692, SWNE Sec 24 T6S R92W, Garfield County, Form 2A (#400074759) Review

Hi Dave!

I am waiting for a response from the field guys as to the location of the drilling (completion) pit. I will then be able to give you a full response to these COA's.

Elaine

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, July 19, 2010 7:48 AM  
**To:** Elaine Winick  
**Subject:** FW: Bill Barrett Corp, Kaufman Pad #6 21A-24-692, SWNE Sec 24 T6S R92W, Garfield County, Form 2A (#400074759) Review

Elaine,

I am resending this Form 2A review email as I have not seen a reply. I know COGCC had email issues for several days. Please review at your convenience. Thanks.

Dave

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**From:** Kubeczko, Dave  
**Sent:** Thursday, July 08, 2010 8:35 AM  
**To:** Elaine Winick  
**Subject:** Bill Barrett Corp, Kaufman Pad #6 21A-24-692, SWNE Sec 24 T6S R92W, Garfield County, Form 2A (#400074759) Review

Elaine,

I have been reviewing the Kaufman Pad #6 21A-24-692 **Form 2A** (#400074759). 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):** This section indicates that a small double lined completion pit will be constructed. This completion pit needs to be marked as a production pit **or drilling pit** 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.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 402 feet. COGCC guidelines require designating all locations within close proximity to surface water 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. **Rule 303.d.(3).C.:** The Location Drawing (Sheet 6 of 7) should show any improvements, particularly any proposed locations of pipelines (gas and water); or if the pipelines will follow the access road, then a statement to that effect is sufficient.
4. **General 317B:** The following conditions of approval (COAs) will also apply:
  - COA 6** - Reserve pit (if constructed) must be lined or closed loop system must be implemented during drilling.
  - COA 9** - Any pit constructed to contain fluids must be lined.
  - 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. 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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