

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, August 11, 2010 7:23 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, ExxonMobil GM 331-34 Pad, NWNE Sec 34 T6S R96W, Garfield County, Form 2A (#400075386) Review

Scan No 2033299

CORRESPONDENCE

2A#400075386

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**From:** Kubeczko, Dave  
**Sent:** Monday, July 26, 2010 4:17 PM  
**To:** Davis, Gregory  
**Subject:** Williams Production RMT, ExxonMobil GM 331-34 Pad, NWNE Sec 34 T6S R96W, Garfield County, Form 2A (#400075386) Review

Greg,

I have been reviewing the ExxonMobil GM 331-34 Pad **Form 2A** (#400075386). 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. **General:** The following conditions of approval (COAs) will also apply:

**COA 6** - Reserve pit (or any pit that will hold liquids [if constructed]) 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.

**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.

**COA 44** - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

**COA 46** - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and /or stormwater runoff.

Based on the information provided in the Form 2A by Williams and the fact that this location has been visited/reviewed by COGCC and the BLM, COGCC will attach these COAs to the Form 2A permit; Williams does not need to respond, unless Williams has questions or concerns with details in this email. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Otherwise I will assume that these COAs are acceptable to Williams. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

Colorado Oil & Gas Conservation Commission

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