

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, August 24, 2010 5:05 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Youberg RWF 33-23 Pad, NWSE Sec 23 T6S R94W, Garfield County, Form 2A (#400052878) Review

Scan No 2033319      CORRESPONDENCE      2A#400052878

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**From:** Davis, Gregory [mailto:Gregory.Davis@Williams.com]  
**Sent:** Thursday, August 12, 2010 4:23 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT, Youberg RWF 33-23 Pad, NWSE Sec 23 T6S R94W, Garfield County, Form 2A (#400052878) Review

Construction should be 6/1/11 and interim reclamation should be 3/1/12.

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Thursday, August 12, 2010 3:41 PM  
**To:** Davis, Gregory  
**Subject:** Williams Production RMT, Youberg RWF 33-23 Pad, NWSE Sec 23 T6S R94W, Garfield County, Form 2A (#400052878) Review

Greg,

I have been reviewing the Youberg RWF 33-23 Pad **Form 2A** (#400052878). 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. **Construction (Section 6):** The date for construction (06/01/2010) appears to be incorrect since it has already passed. Can you confirm the estimated schedule and the dates for both construction and interim reclamation. I can make the change if you send an email with this request.
2. **General:** The following conditions of approval (COAs) will apply:
  - COA 6a** - Any pit that will hold liquids [if constructed], must be lined or a closed loop system (which has been indicated on the Form 2A by Williams) 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; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures sufficiently protective of nearby surface water. 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 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, COGCC will attach these COAs (item 2) to the Form 2A permit, unless Williams has questions or concerns with details in this email. COGCC would appreciate it if Williams could provide the additional clarification requested above (item 1) in your response to this e-mail. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

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

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