

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, September 10, 2010 10:32 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Jolley KP 13-17 Pad, NWSW Sec 17 T6S R91W, Garfield County, Form 2A (#400082484) Review

Scan No 2033362 CORRESPONDENCE 2A#400082484

From: Kubeczko, Dave
Sent: Thursday, August 19, 2010 5:48 PM
To: Davis, Gregory
Subject: Williams Production RMT, Jolley KP 13-17 Pad, NWSW Sec 17 T6S R91W, Garfield County, Form 2A (#400082484) Review

Greg,

I have been reviewing the Jolley KP 13-17 Pad **Form 2A** (#400082484). COGCC requests the following clarifications regarding the data Williams has submitted on or attached to the Form 2A, as well as review and acknowledgement of any conditions of approval (COAs) prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General 317B:** The following conditions of approval (COAs) will also apply:
 - COA 57** - A closed loop system must be implemented during drilling operations. Any pit constructed to hold fluids must be lined.
 - COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.
 - 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.

Based on the information provided in the Comments (Section 15) by Williams, COGCC will attach these COAs to the Form 2A permit, Williams does not need to respond. 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

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