

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 14, 2010 5:34 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Federal RGU 31-24-198 Pad , Lot 2 Sec 2435 T1S R98W, Garfield County, Form 2A #400088436 Review

Categories: Brown Category

Scan No 2033378 CORRESPONDENCE 2A#400088436

From: Head, Jennifer [mailto:Jennifer.Head@Williams.com]
Sent: Tuesday, August 31, 2010 8:01 AM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Federal RGU 31-24-198 Pad , Lot 2 Sec 2435 T1S R98W, Garfield County, Form 2A #400088436 Review

Williams concurs with these COAs.

Jennifer Head
Regulatory Team Lead, Piceance Asset
Williams Production RMT Co.
Direct 303-606-4342
Mobile 970-218-3512

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, August 30, 2010 4:43 PM
To: Head, Jennifer
Subject: Williams Production RMT, Federal RGU 31-24-198 Pad , Lot 2 Sec 2435 T1S R98W, Garfield County, Form 2A #400088436 Review

Jennifer,

I have been reviewing the Federal RGU 31-24-198 Pad **Form 2A** (#400088436). COGCC will attach the following conditions of approval (COAs) based on the data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 4858 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC guidelines require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) a **sensitive area** (which Williams has already indicated on the Form 2A) and requiring the following conditions of approval (COAs):
COA 4 - Location is in a sensitive area because of close 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.
2. **General:** COGCC's review indicates that due to the highly fractured nature of the surface material in the area, the following conditions of approval (COAs) will apply:

COA 9 - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.

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.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 2) to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
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