

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, November 10, 2010 7:20 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, ExxonMobil MV 23-27 Pad, Lot 1 Sec 27 T6S R96W, Garfield County, Form 2A #400102834 Review

Categories: Brown Category

Scan No 2033494 CORRESPONDENCE 2A#400102834

From: Kubeczko, Dave
Sent: Tuesday, November 02, 2010 5:54 PM
To: Davis, Gregory
Subject: Williams Production RMT, ExxonMobil MV 23-27 Pad, Lot 1 Sec 27 T6S R96W, Garfield County, Form 2A #400102834 Review

Greg,

I have been reviewing the ExxonMobil MV 23-27 Pad **Form 2A** (#400102834). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Williams RMT has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

- Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 154 feet. COGCC guidelines require designating all locations within close proximity to surface water a *sensitive area* (which Williams has already indicated on the Form 2A); therefore, the following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of its 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, including any fluids conveyed via pipeline.
- Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 16 feet bgs for a well located 6894 feet from the proposed well pad. Based on the surface geology (alluvium consisting of sands and gravels) this is considered a *sensitive area*. The following condition of approval (COA) will apply:
 - COA 7** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or a closed loop system (which Williams has already indicated on the Form 2A) must be implemented.
- General:** Since the location is in close proximity to Wheeler Gulch, the following conditions of approval (COAs) will also apply:
 - 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 (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad and frac pad locations will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.
 - COA 25** - Flowback to tanks only. Flowback and stimulation fluids shall be contained within tanks that are placed on the well pad in an area with additional downgradient perimeter berming.
 - 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 47 - The area of the well pad where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 73 - Operator will conduct regular inspections of equipment for leaks and equipment problems with appropriate documentation retained in the operator's office. All equipment deficiencies shall be corrected. Monitoring should end approximately 30 days after well completion and/or after production has been stabilized; however, timely inspections should continue during the production phase.

COA 74 - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

Based on the information provided on the Form 2A by Williams, COGCC will attach the COAs listed above to the Form 2A permit unless Williams has questions or concerns with details in this email. These COAs reiterate what Williams has proposed in the Comment section of the Form 2A. The COAs are placed on the permit so that COGCC's inspectors will have a readily available list of COAs to review prior to conducting their inspection. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

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