

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, December 14, 2010 2:52 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Federal BCU 12-31-198, Lot 6 Sec 31 T1N R98W, Rio Blanco County, Form 2A (#400114106) Review

Scan No 2033540

CORRESPONDENCE

2A#400114106

From: Kubeczko, Dave
Sent: Friday, December 10, 2010 5:07 PM
To: Harris, Howard
Subject: Williams Production RMT, Federal BCU 12-31-198, Lot 6 Sec 31 T1N R98W, Rio Blanco County, Form 2A (#400114106) Review

Howard,

I have been reviewing the Federal BCU 12-31-198 **Form 2A** (#400114106). 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.

- General:** The following conditions of approval (COAs) will apply:
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluid conveyed via temporary surface pipelines.
 - COA 6** - Reserve pit (and any other pit constructed to hold fluids) 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 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. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit (if constructed) located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area 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 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. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.
 - 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 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.

Based on the information provided in the Form 2A by Williams, 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
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