

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, June 01, 2011 2:55 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Sandridge (Cuttings Management) 399-1-4, Lot 4 Sec 1 T3S R99W, Rio Blanco County, Form 2A (#400117921) Review

Categories: Orange - Operator Correspondence

Scan No 2033849 CORRESPONDENCE 2A#400117921

From: Kubeczko, Dave
Sent: Wednesday, June 01, 2011 2:53 PM
To: 'Harris, Howard'
Cc: 'Blaney, Karolina '; 'Mestas, April'
Subject: Williams Production RMT, Sandridge (Cuttings Management) 399-1-4, Lot 4 Sec 1 T3S R99W, Rio Blanco County, Form 2A (#400117921) Review

Howard,

I have been reviewing the Sandridge (Cuttings Management) 399-1-4 **Form 2A** (#400117921). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 287 feet, making this a **sensitive area**. The following condition of approval (COA) will apply:
COA 23 - Location is in a sensitive area because of its proximity to surface water; therefore, operator must implement best management practices (BMPs) associated with stormwater management; 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. 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.
2. **General:** The following conditions of approval (COAs) will apply:
COA 91 - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to start of construction.
COA 92 - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to transport of cuttings to this location.
COA 67 - Operator must submit a Materials Management Plan (MMP) via a Form 4 Sundry to the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) by **July 1, 2011**, for approval prior to transporting cuttings from other well pads to this location. This Sundry should include a list of all proposed locations where cuttings will be sent from to this cuttings management location. The MMP must describe how the operator intends to comply with Rule 907; in particular, describe the operator's plans for handling the cuttings, bentonite, and frac sand that both meet and exceed the requirements of Table 910-1. This plan shall also describe how the operator will profile, track, document placement of each material waste stream from each well/pad.
COA 68 - All materials brought to this location that exceed the requirements in Table 910-1 will be placed in an area of the site that is completely segregated from materials that meet the requirements in Table 910-1. This area must be lined and bermed and appropriate BMPs need to be in place during the entire operational

lifetime (no more than three years from date of start of construction. Sufficient 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 47 - The area where cuttings that exceed the requirements of Table 910-1 will be stored/treated/amended must be constructed to be sufficiently impervious to contain any spill or release of material or any accumulations of fluids.

COA 38 - The moisture content of any drill cuttings placed in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

3. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland) and a reference area has been indicated on a topographic map; four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (01/27/2011).

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. Thanks.

Dave

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

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