

## Kubeczko, Dave

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**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT RGU 11-25-198 PAD, NWNW Sec 25 T1S R98W, Rio Blanco County, Form 2A #1637160 Review  
**Attachments:** RGU 11-25-198 Rev. Exh 2D.pdf

Scan No 2032689      CORRESPONDENCE      2A#1637160

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**From:** Head, Jennifer [mailto:Jennifer.Head@williams.com]  
**Sent:** Thursday, December 10, 2009 3:14 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT RGU 11-25-198 PAD, NWNW Sec 25 T1S R98W, Rio Blanco County, Form 2A #1637160 Review

Dave,

Thank you for your patience.

Item 1. We plan to drill 10 wells on this pad, at 20 days per well, we will be drilling for 200 days. Completion operations require another 5-6 weeks per well, so it will be a good 20 months of solid drilling and completion activity on this pad before interim reclamation can take place. Williams will be able to commence interim reclamation within the 6 month time period after completion ops.

Item 2. Williams finds these two COAs acceptable.

Item 3. Attached please find a revised Exhibit 2D indicating the location of the gas and two water lines paralleling the road. There will not be a pig launcher located within 400' of the pad, it will actually be located further down the road about another 2-300' (total of 6-700' from pad) where another gathering line will tie in.

Please let me know if you require anything further.

Jennifer Head  
Williams Production RMT Co.  
Direct 303-606-4342  
Mobile 970-218-3512

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Tuesday, November 24, 2009 3:26 PM  
**To:** Head, Jennifer  
**Subject:** Williams Production RMT RGU 11-25-198 PAD, NWNW Sec 25 T1S R98W, Rio Blanco County, Form 2A #1637160 Review

Jennifer,

I have been reviewing the Williams Production RMT RGU 11-25-198 PAD **Form 2A** (#1637160). COGCC requests the following clarifications regarding the data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The dates for construction and interim reclamation are 20 months apart. For non-crop land, interim reclamation must begin within 6 months of drilling and completion. Can you confirm these dates. I can make any changes if you send an email with these requests.

2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 182 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** 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.
3. **Rule 303.d.(3).C.:** The Location Drawing (Exhibit 2D) does not show the location of the proposed gas (1) and water (2) pipelines, or the pigging station beyond the disturbed area (within the 400' visible improvement zone). This drawing should show the anticipated locations of these new facilities.

COGCC requires your written acknowledgement of these COAs prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

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

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