

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, February 15, 2010 3:53 PM
To: Kubeczko, Dave
Subject: Williams Production RMT Savage PA 21-9, NENW Sec 9 T7S R95W, Garfield County, Form 2A (#2094319) Review

Scan No 2032846 CORRESPONDENCE 2A#2094319

From: Harris, Howard [mailto:Howard.Harris@Williams.com]
Sent: Wednesday, February 10, 2010 2:54 PM
To: Kubeczko, Dave
Subject: PA 21-9 Form 2A Review

David

Regarding your email pertaining to Savage PA 21-9 form 2A, we offer the following clarification. The PA 21-9 pad is built and rig ready with conductors set. We had one permit that was approved prior to the new rules and used that for construction. The construction was complete prior to date of form 2A implementation. The remaining wells will be drilled around 2/2011 and completion operations completed later in the fall. The suggested date of 6/2012 for interim construction is a best guess and allows for winter weather for completion.

With regard to the sensitive area determination for the area, we wish to waive this designation, but do not have a problem with the 110 percent secondary capacity. We also include 6 pages of BMP's sufficient to contain any unintentional release of fluids.

We will provide a plat showing the proposed pipe lines as requested.

We have no problems with the general COA's pertaining to moisture content and drill cuttings.

I hope this helps resolve some of the issues. Please contact me if you need anything else.

Howard Harris
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Williams Production RMT
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From: Kubeczko, Dave
Sent: Sunday, February 07, 2010 3:32 PM
To: Harris, Howard
Subject: Williams Production RMT Savage PA 21-9, NENW Sec 9 T7S R95W, Garfield County, Form 2A (#2094319) Review

Howard,

I have been reviewing the Savage PA 21-9 (#2094319) **Form 2A**. 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 (OGLA).

1. **Construction (Section 6):** The dates for construction (01/12/2010) and interim reclamation (06/01/2012) appear to be incorrect since the construction date has already passed the dates appear to be too far apart. Since only four (4) wells are planned to be drilled and completed at this pad, 17 months seems like a long time between drilling/completion and the start of interim reclamation. COGCC guidelines require that interim reclamation begins 6 months after well drilling/completion on non crop land. Can you confirm the estimated drilling/completion schedule (which may include any additional weels planned at this pad) and these dates. I can make the changes (if necessary) if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 2407 feet. COGCC's review there is an intermittent stream locate 505 feet to the southwest of the proposed well pad. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of 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.:** Neither the scaled Construction Layout Drawing (Plat 2) nor the Location Drawing (Plat 6) show the location of the proposed gas, water, and oil pipelines pipeline. One of these drawings (preferably the scaled location drawing showing all visible improvements [pipelines, etc.] within 400 feet from the edge of surface disturbance) should show the anticipated location of this gas, water, and oil pipelines.
4. **General:** Due to the highly fractured nature of the surface material in this area, the following conditions of approval (COAs) will apply:
 - 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 to the Form 2A permit prior to passing the OGLA review. The other issues will also need to be addressed. The general COAs had been previously attached to Form 2#2006208 for well Savage PA 522-9 approved December 11, 2008. The other issues will also need to be addressed. 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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