

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, March 08, 2010 5:17 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT Federal RGU 33-24-198 PAD, NWSE Sec 24 T1S R98W, Rio Blanco County, Form 2A (#2095264) Review

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Scan No 2032936 CORRESPONDENCE 2A#2095264

From: Head, Jennifer [mailto:Jennifer.Head@williams.com]
Sent: Tuesday, March 02, 2010 2:13 PM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT Federal RGU 33-24-198 PAD, NWSE Sec 24 T1S R98W, Rio Blanco County, Form 2A (#2095264) Review

Williams concurs with these proposed COAs.

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

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, March 02, 2010 1:23 PM
To: Head, Jennifer
Subject: Williams Production RMT Federal RGU 33-24-198 PAD, NWSE Sec 24 T1S R98W, Rio Blanco County, Form 2A (#2095264) Review

Jennifer,

I have been reviewing the Federal RGU 33-24-198 PAD (#2095264) **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. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 366 feet. 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.
2. **General:** Due to the highly fractured nature of the surface material in this area, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit must be lined
 - 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 general COAs had been previously attached to Form 2#2007450 for well RGU 34-24 198 approved February 13, 2009. 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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