

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, March 18, 2010 10:05 AM
To: Kubeczko, Dave
Subject: FW: Resend of Williams Production RMT, American Soda GM 23-24, NESW Sec 34 T6S R96W, Garfield County, Form 2A (#400034632) Review

Scan No 2032961 CORRESPONDENCE 2A#400034632

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Wednesday, March 03, 2010 8:44 AM
To: Kubeczko, Dave
Cc: Mestas, April ; Rider, Kent ; Shoemaker, Mike
Subject: RE: Resend of Williams Production RMT, American Soda GM 23-24, NESW Sec 34 T6S R96W, Garfield County, Form 2A (#400034632) Review

Dave,

Indicated in red are responses and questions to your proposed COA's.

Thanks,

Greg
303-606-4071

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, February 25, 2010 3:40 PM
To: Davis, Gregory
Subject: Resend of Williams Production RMT, American Soda GM 23-24, NESW Sec 34 T6S R96W, Garfield County, Form 2A (#400034632) Review

Greg,

I have been reviewing the American Soda GM 23-24 **Form 2A** (#400034632). 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. **Facilities (Section 5):** The Form 2A Construction layout drawing (Plat #2) indicates that there will be a separate flare pit located along the eastern edge of the well pad. This flare pit needs to be marked as a special purpose pit and a Form 15 (Earthen Pit Report/Permit) needs to be submitted. I can make the change if you send an email with this request. **Williams at the time of submittal of the 2A or very shortly thereafter does file a Form 15 for the flare pit, as required by COGCC rules.**
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 455 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. **Williams has received several notices where the state has determined that the pad is in a sensitive area. On these same pads, including this one, Williams has paid a 3rd party contractor who has made a determination that the pads were not located in sensitive areas. ("Sensitive Area Determination Report" has been included as an attachment to the 2A) Williams has made an attempt to**

find out what guidelines the state is using for their determination and justification, and have been unable to locate rules or policies for this determination. We would appreciate your help in this area.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids. **“Best Management Practices” included as an attachment to the 2A indicates Williams will “Install impermeable barriers beneath fluid pits to protect groundwater, riparian areas and wetlands” and “Store and stage emergency spill response equipment at strategic locations so that it is available to expedite effective spill responses”.**

3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 31 feet bgs for a well located 1337 feet away from the existing well pad. Although the depth to groundwater cannot be confirmed to be less than 20 feet bgs at this well location, the potential exists for surface releases to reach groundwater due to the potentially permeable nature of the unconsolidated alluvial sands and gravels in this area; therefore, the following condition of approval (COA) will apply:

COA 2 - Location may be in a sensitive area due to shallow groundwater; therefore, either a lined drilling pit or closed loop system must be implemented. **As indicated on the Form 2 and Form 2A Williams uses a closed loop system in its drilling operations.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit 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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