

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 13, 2010 7:49 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Federal DOE 2-W-29, SENE Sec 29 T6S R95W, Garfield County, Form 2A (#400044070) Review

Scan No 2033063 CORRESPONDENCE 2A#400044070

From: Harris, Howard [mailto:Howard.Harris@Williams.com]
Sent: Monday, April 12, 2010 1:38 PM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Federal DOE 2-W-29, SENE Sec 29 T6S R95W, Garfield County, Form 2A (#400044070) Review

David

Following is clarification regarding your questions pertaining to the DOE 2-W-29:

Facilities (Section 5) There is a small pit which is actually part of the cuttings trench which is labeled as a flare pit. This pit is approx 10X10X6' deep. It is not a real flare pit as such and we do not flare. The BLM requests us have the pit for an emergency. There is never any fluid in the pit. We have tried to get them to call it something else on the plat. If you wish, you can make the change on the form 2A to call it special purpose pit. If you really need a form 15 for the pit, We will submit one. Like I said, it is not really a flare pit. You may want to talk to David Andrews for his opinion.

Construction (Section 6) The wells are scheduled to spud approx April 2011. Construction should start on or around 10/2010. Allowing approx 6 months for drilling and completion would put interim reclamation somewhere around October or November 2011. Please change the form 2A to reflect these dates.

Water Resources (Section 14) Williams agrees to COA #4 and COA #5. Williams will utilize at a minimum 110% secondary containment. Williams currently has BMP's in place to contain any unintentional release of fluids.

Williams concurs with the proposed COA's and hopes that this will address the other issues. IF anything else is needed, please advise.

thanks

Howard Harris
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, April 07, 2010 1:30 PM
To: Harris, Howard
Subject: Williams Production RMT, Federal DOE 2-W-29, SENE Sec 29 T6S R95W, Garfield County, Form 2A (#400044070) Review

Howard,

I have been reviewing the Federal DOE 2-W-29 **Form 2A** (#400044070). 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. **Facilities (Section 5):** The construction layout drawings (Figure 1) indicate that there will be a separate flare pit located east of the reserve pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request.
2. **Construction (Section 6):** The dates for construction and interim reclamation appear to be incorrect since they are the same (10/01/2010). Since the pad is existing, can you confirm what the drilling/completion schedule is. I can make the changes if you send an email with these requests.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 328 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 and a domestic water well; 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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues 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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