

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 13, 2010 9:03 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Federal KP 34-18, SWSE Sec 18 T6S R91W, Garfield County, Form 2A (#400037551) Review

Scan No 2033066 CORRESPONDENCE 2A#400037551

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Monday, April 12, 2010 4:38 PM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Federal KP 34-18, SWSE Sec 18 T6S R91W, Garfield County, Form 2A (#400037551) Review

Williams concurs with these COA's.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, April 07, 2010 5:36 PM
To: Davis, Gregory
Subject: Williams Production RMT, Federal KP 34-18, SWSE Sec 18 T6S R91W, Garfield County, Form 2A (#400037551) Review

Greg,

I have been reviewing the Federal KP 34-18 **Form 2A** (#400037551). 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):** Based on other locations nearby, it appears that some facilities (i.e., condensate tanks, water tanks, separators, pipelines, etc.) have not been indicated on the Form 2A. If you can confirm what new and/or existing facilities are planned for this location, I can make the change if you send an email with this request.
2. **Facilities (Section 5):** The construction layout drawing (Plat 2) indicates that there will be a separate flare pit located north of the cuttings pit. 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.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 249 feet. Although the nearest surface water may be an ephemeral or intermittent stream, the potential for a release to migrate offsite exists. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet, which includes intermittent and/or ephemeral streams/drainages) a **sensitive area** 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.
4. **General:** The following condition of approval (COA) 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.

5. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (03/15/2010).

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 prior to permit approval. 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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