

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 13, 2010 12:42 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Chevron TR 41-32-597 Pad, NENE Sec 32 T5S R97W, Garfield County, Form 2A (#400042254) Review

Scan No 2033073 CORRESPONDENCE 2A#400042254

From: Head, Jennifer [mailto:Jennifer.Head@Williams.com]
Sent: Tuesday, April 13, 2010 11:48 AM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Chevron TR 41-32-597 Pad, NENE Sec 32 T5S R97W, Garfield County, Form 2A (#400042254) Review

Williams concurs with these 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: Wednesday, April 07, 2010 2:20 PM
To: Head, Jennifer
Subject: Williams Production RMT, Chevron TR 41-32-597 Pad, NENE Sec 32 T5S R97W, Garfield County, Form 2A (#400042254) Review

Jennifer,

I have been reviewing the Chevron TR 41-32-597 Pad **Form 2A** (#400042254). 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. **General:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit must be lined.
 - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - 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.

2. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

COA 6 - All pits must be lined.

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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