

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, April 29, 2010 3:05 PM
To: Kubeczko, Dave
Subject: FW: Resend of Bill Barrett Corp, Kaufman (Pad #4) 43D-25-692, NWNW Sec 30 T6S R91W, Garfield County, Form 2A (#2589108) Review

Scan No 2033083 CORRESPONDENCE 2A#2589108

From: Matt Barber [mailto:mbarber@billbarrettcorp.com]
Sent: Wednesday, April 21, 2010 1:43 PM
To: Kubeczko, Dave
Subject: RE: Resend of Bill Barrett Corp, Kaufman (Pad #4) 43D-25-692, NWNW Sec 30 T6S R91W, Garfield County, Form 2A (#2589108) Review

Hi Dave,

I am very sorry that I'm just now getting back to you on this!

Indicated below in blue text are Bill Barrett Corp's response/concurrences to these COAs.

Please let me know if you have any questions or need any additional information.

Thank you,

Matt

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, April 19, 2010 12:35 PM
To: Matt Barber
Subject: Resend of Bill Barrett Corp, Kaufman (Pad #4) 43D-25-692, NWNW Sec 30 T6S R91W, Garfield County, Form 2A (#2589108) Review

Matt,

I sent this email on April 6, 2010 and have not heard back. I was wondering if you received this one. Thanks.

Dave

From: Kubeczko, Dave
Sent: Tuesday, April 06, 2010 6:40 PM
To: Matt Barber
Subject: Bill Barrett Corp, Kaufman (Pad #4) 43D-25-692, NWNW Sec 30 T6S R91W, Garfield County, Form 2A (#2589108) Review

Matt,

I have been reviewing the Kaufman (Pad #4) 43D-25-692 **Form 2A** (#2589108). COGCC requests the following clarifications regarding the data Bill Barrett Corp has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** Although the construction layout drawings do not indicate that there will be a separate flare pit, based on the other Form 2A permits submitted for this general area, I believe that BBC will have a flare pit. If this is the case, then 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. **BBC will not construct the flare pit indicated on the construction layout drawings (sheet 4 of 12).**
2. **Facilities (Section 4):** Since 30 (500 bbls) temporary frac tanks will be onsite, the following condition of approval (COA) will apply:
 - 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. **BBC Response: Agreed**
3. **Construction (Section 6):** The ground elevation of 5786 is approximately 562 feet lower than the estimated post-construction ground elevation of 6348 feet msl. Based on the Grading Plan and Pad Layout drawing, I believe the correct elevation should be 5788 feet msl. I can make the change if you send an email with this request. **BBC Response: Agreed, please make this change.**
4. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 218 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. **BBC Response: Agreed**
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids. **BBC Response: Agreed**
5. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 140 feet bgs for a domestic water well located 535 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 228056-McDonald, domestic well) located to the east-northeast, with a total depth of 140 feet bgs, a depth to groundwater of 44 feet bgs, and a pumping rate of 5 gpm. I believe this is the well you located. I can make the change if you send me an email with this request. In addition, COGCC's review of other nearby water wells indicate that groundwater ranges in depth from 18 to 39 feet bgs. Based on this information and COGCC guidelines require designating all locations within close proximity within 1/8 of a mile (660 feet) of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented. **BBC Response: Agreed**
 - COA 8** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore all pits must be lined. **BBC Response: Agreed**
6. **General:** The following condition of approval (COA) will also 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. **BBC Response: Agreed**

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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