

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, May 17, 2010 2:37 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Jolley KP 24-17, SESW Sec 17 T6S R91W, Garfield County, Form 2A (#400054778) Review

Scan No 2033118 CORRESPONDENCE 2A#400054778

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Monday, May 03, 2010 4:02 PM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Jolley KP 24-17, SESW Sec 17 T6S R91W, Garfield County, Form 2A (#400054778) Review

Williams concurs with the below listed COA's.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, April 30, 2010 9:29 AM
To: Davis, Gregory
Subject: Williams Production RMT, Jolley KP 24-17, SESW Sec 17 T6S R91W, Garfield County, Form 2A (#400054778) Review

Greg,

I have been reviewing the Jolley KP 24-17 **Form 2A** (#400054778). 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. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1615 feet. COGCC's review indicates there is a pond located approximately 300 feet to the southwest (based on topographic map and aerial photo 2009). I can make the change if you send me an email with this request. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in 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.
2. **Water Resources (Section 14):** Form 2A indicates that the location falls within the external buffer zone and that all public water supply systems within 15 miles have been notified. **Rule 317B.e.(1)**. requires that pitless drilling systems or containment of all drilling flowback and stimulation fluids pursuant to Rule 904 be followed. Therefore, the following conditions of approval (COAs) will apply:
 - COA 7** - A closed loop system must be implemented.
 - COA 8** - Production pits must be lined.
 - 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.
3. **Rule 303.d.(3).C.:** Neither the Location Drawing (Plat 6) nor the scaled Construction Layout Drawings (Plat 2) show the location of the existing/proposed gas and water pipelines. One of these drawings should show the existing/anticipated locations of these facilities. In lieu of amending one of these drawings, if the pipelines follow the access road, a statement in the comments section would be acceptable. I can add that statement if you send me an email with this request.

4. **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.

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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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