

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 25, 2010 9:21 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Bill Barrett Corp, GGU Daley 14A-19-691, SESW Sec 19 T6S R91W, Garfield County, Form 2A (#400055201) Review  
**Attachments:** GGU Daley 14A-19-691 Pad - Town of Silt Rule 317B Notification (Revised).pdf; GGU Daley 14A-19-691 Pad - City of Rifle Rule 317B Notification (Revised).pdf  
**Importance:** High

Scan No 2033136      CORRESPONDENCE      2A#400055201

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**From:** Matt Barber [mailto:mbarber@billbarrettcorp.com]  
**Sent:** Monday, May 10, 2010 4:29 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Bill Barrett Corp, GGU Daley 14A-19-691, SESW Sec 19 T6S R91W, Garfield County, Form 2A (#400055201) Review  
**Importance:** High

Dave,

I'm sorry but the letter notifications to the City of Rifle and Town of Silt that I provided to you in the previous email had the incorrect Range indicated. Attached are revised letters that indicate this correction.

Please let me know if you have any questions or need anything else.

Thank you,

Matt

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**From:** Matt Barber  
**Sent:** Monday, May 10, 2010 2:52 PM  
**To:** 'Kubeczko, Dave'  
**Subject:** RE: Bill Barrett Corp, GGU Daley 14A-19-691, SESW Sec 19 T6S R91W, Garfield County, Form 2A (#400055201) Review

Hey Dave,

Indicated below in blue text are Bill Barrett Corp's response/concurrences to these COAs. Also, attached are notification to public water supply systems within 15 miles of the DCPS.

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

Thank you,

Matt

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, April 30, 2010 8:52 AM  
**To:** Matt Barber

**Subject:** Bill Barrett Corp, GGU Daley 14A-19-691, SESW Sec 19 T6S R91W, Garfield County, Form 2A (#400055201)  
Review

Matt,

I have been reviewing the GGU Daley 14A-19-691 **Form 2A** (#400055201). 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 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**
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 325 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**
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 180 feet bgs for a well located 18 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 239427-MoQuin, household well) located approximately 368 feet to the north, with a total depth of 81 feet bgs, a depth to groundwater of 18 feet bgs, and a pumping rate of 10 gpm. I believe this is the well you located (this well is also shown on the attached Hydrology Map). I can make the change if you send me an email with this request. COGCC's guidelines require designating all locations within close proximity within  $\frac{1}{8}$  of a mile (660 feet) of a domestic water well and shallow groundwater (i.e., less than 20 feet bgs) 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 production pits must be lined. **BBC Response: Agreed**
4. **Water Resources (Section 14):** Form 2A indicates that all public water supply systems within 15 miles have been notified. **Rule 303.d.(3).N.** requires documentation that the applicant has provided notification of the application submittal to potentially impacted water systems within fifteen (15) stream miles downstream. Can you please provide copies of these notices. [Please see the attached.](#)
5. **Rule 303.d.(3).C.:** Neither the Location Drawing nor the scaled Construction Layout Drawings show the location of the proposed gas, oil, 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. **BBC Response: If existing pipelines need to be upgraded, the new pipelines would follow the access road.**
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 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](mailto:dave.kubeczko@state.co.us)



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