

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 12:04 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Holl RWF 13-31, NWSW Sec 31 T6S R94W, Garfield County, Form 2A (#400055043) Review
Attachments: SKMBT_C45110050410190.pdf

Scan No 2033157 CORRESPONDENCE 2A#400055043

From: Harris, Howard [mailto:Howard.Harris@Williams.com]
Sent: Tuesday, May 04, 2010 10:33 AM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Holl RWF 13-31, NWSW Sec 31 T6S R94W, Garfield County, Form 2A (#400055043) Review

Dave

Attached is a plan of development for the RWF 13-31 well pad. Please note that for the most part, the pipelines will follow the access road. I hope this will satisfy rule 303.d.(3).C

As for the other proposed COA's, Williams currently has best management practices in place to more than satisfy your requirements. Williams has no problem with attaching the proposed COA's to the form 2A permit.

I hope this satisfies all your concerns and if further info is needed, please advise.

thanks

Howard Harris
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, April 30, 2010 1:54 PM
To: Harris, Howard
Subject: Williams Production RMT, Holl RWF 13-31, NWSW Sec 31 T6S R94W, Garfield County, Form 2A (#400055043) Review

Howard,

I have been reviewing the Holl RWF 13-31 **Form 2A** (#400055043). 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. **Facilities (Section 4):** Based on the proposed Frac Pad shown on the Construction Layout Drawings, the following condition of approval (COA) will apply for the frac pad area:

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.

2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 135 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 from the well pad area:

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.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 85 feet bgs for a well located 638 feet from the proposed well pad. COGCC's 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; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

4. **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.

5. **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.

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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs 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

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