

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 11:01 AM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Kaufman (Pad #7) 23A-24-692, NWSE Sec 24 T6S R92W, Garfield County, Form 2A (#400060766) Review

Scan No 2033150 CORRESPONDENCE 2A#400060766

From: Tracey Fallang [mailto:tfallang@billbarrettcorp.com]
Sent: Friday, May 14, 2010 10:38 AM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, Kaufman (Pad #7) 23A-24-692, NWSE Sec 24 T6S R92W, Garfield County, Form 2A (#400060766) Review

Dave, per our discussion, this is an existing pad and existing lined pit built under the interim policy and therefore COA 39 will not apply. No additional disturbance is proposed beyond what currently exists.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, May 14, 2010 10:12 AM
To: Tracey Fallang
Subject: RE: Bill Barrett Corp, Kaufman (Pad #7) 23A-24-692, NWSE Sec 24 T6S R92W, Garfield County, Form 2A (#400060766) Review

Tracey,

Item 1. Is there just one pipeline (gas) or others? The guidelines for sensitive area determination are based on several factors and cannot be limited to discrete values (distances, slopes, etc.) or sets of criteria. These are internal guidelines used by our staff in reviewing permits and vary based on location within the state. An Instructions Guide for the Form 2A is currently being updated.

Item 2. COA 4 is for the drilling and fracing procedures, which are not permanent structures and do not fall under Rule 604(a)(4).

Item 3. As far as the COAs, as I stated earlier, the distances are guidelines and not considered set in stone. BBC has indicated they will be using a closed loop system; therefore, these COAs will remain on the permit.

Item 6, COA 39 will also remain since the area surrounding the pad is greater than 10%. In addition, based on the prior use of this COA by the engineering group in Rifle, this COA does not apply only to slopes greater than 10%, but rather, it is applied uniformly to all locations in Garfield, Rio Blanco, and Mesa Counties. Thanks.

Dave

From: Tracey Fallang [mailto:tfallang@billbarrettcorp.com]
Sent: Friday, May 14, 2010 8:54 AM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, Kaufman (Pad #7) 23A-24-692, NWSE Sec 24 T6S R92W, Garfield County, Form 2A (#400060766) Review

Dave, in response to your requested clarifications below:

1. This is an existing pad with an existing pipeline. I'll get you a plat on this.
2. Can you please provide us with a copy of your "COGCC guidelines" for determining a sensitive area? I'd like to have a better understanding of what you are using for making these determinations.

- COA 4:** COGCC Rule 604(a)(4) already requires berms or secondary containment devices to be constructed around oil, condensate and produced water tanks. Therefore, BBC will adhere as required
3. Your comment notes that within 660 feet you classify as sensitive area. This well is further away than that, 688'. Therefore, these should not apply.
4. Location drawing plat attached.
5. Yes, this will be supplied as required.
6. **COA 6, COA 23** (already required under COA 4 and COGCC rules already require), **COA 38: OK**
COA 39 – BBC does not agree to this as per previous correspondence with you, this COA only applies to locations with a >10% slope.

Thanks.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, May 13, 2010 4:56 PM
To: Tracey Fallang
Subject: Bill Barrett Corp, Kaufman (Pad #7) 23A-24-692, NWSE Sec 24 T6S R92W, Garfield County, Form 2A (#400060766) Review

Tracey,

I have been reviewing the Kaufman (Pad #7) 23A-24-692 **Form 2A** (#400060766). 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):** Based on Form 2As submitted for nearby well pads, I would assume that gas, oil, and/or water pipelines might be existing or proposed for this well pad location. If pipelines are existing, or will be constructed, I can add them to this section if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 418 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.
 - 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 80 feet bgs for a well located 688 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.:** The Location Drawing (Sheet 2 of 7) does not show the 400-foot radius from the edge of disturbance showing all visible improvements. This drawing should show any improvements, particularly any proposed/existing locations of pipelines.
5. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), and a reference area has been indicated on a topographic map; four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (05/10/2010).
6. **General 317B:** The following conditions of approval (COAs) will also apply:
 - COA 6** - Reserve pit must be lined or closed loop system must be implemented during drilling.
 - 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.

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

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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