

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 5:45 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Jolley KP 32-17 Pad, SWNE Sec 17 T6S R91W, Garfield County, Form 2A (#400053244) Review

Scan No 2033173 CORRESPONDENCE 2A#400053244

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Monday, May 17, 2010 7:16 AM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, Jolley KP 32-17 Pad, SWNE Sec 17 T6S R91W, Garfield County, Form 2A (#400053244) Review

Williams concurs with the below listed COA's.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, May 14, 2010 11:45 AM
To: Davis, Gregory
Subject: Williams Production RMT, Jolley KP 32-17 Pad, SWNE Sec 17 T6S R91W, Garfield County, Form 2A (#400053244) Review

Greg,

I have been reviewing the Jolley KP 32-17 Pad **Form 2A** (#400053244). 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 414 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.
2. **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).
3. **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
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