

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, May 31, 2010 9:41 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, ExxonMobil MV 29-27 Pad, NWSE Sec 27 T6S R96W, Garfield County, Form 2A (#400059453) Review

Scan No 2033177 CORRESPONDENCE 2A#400059453

From: Kubeczko, Dave
Sent: Monday, May 31, 2010 9:34 AM
To: Davis, Gregory
Subject: Williams Production RMT, ExxonMobil MV 29-27 Pad, NWSE Sec 27 T6S R96W, Garfield County, Form 2A (#400059453) Review

Greg,

I have been reviewing the ExxonMobil MV 29-27 Pad **Form 2A** (#400059453). 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. **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 (05/17/2010).
2. **General:** 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.
 - COA 44** - The access road will be constructed as to not allow any sediment to migrate from the access road to the nearby surface water or any drainages leading the surface water.
 - COA 46** - The location is in an area where an intermittent drainage is present and has previously be rerouted; therefore the pad shall be constructed to prevent any stormwater run-on and /or stormwater runoff.

Based on the information provided in the Comments (Section 15) by Williams, COGCC will attach these COAs to the Form 2A permit, Williams does not need to respond, unless Williams has questions or concerns with details in this email. In addition, COGCC understands that Williams will provide the reference area photos within 12 months of the Form 2A permit application date (05/04/2010) and indicate the location (either on a topographic map or in a statement). COGCC will list this location as a **sensitive area** due to its proximity to surface water. If you have any questions regarding this email, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Otherwise I will assume that these changes, requests, and COAs are acceptable to Williams. Thanks.

Dave

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

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