

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, June 15, 2010 7:47 AM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Cox 2-12-39-18, NWNE Sec 12 T39N R18W, Dolores County, Form 2A (#400066003) Review

Follow Up Flag: Follow up
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Scan No 2033212 CORRESPONDENCE 2A#400066003

From: Elaine Winick [mailto:EWinick@billbarrettcorp.com]
Sent: Wednesday, June 09, 2010 3:34 PM
To: Kubeczko, Dave
Cc: Tracey Fallang
Subject: RE: Bill Barrett Corp, Cox 2-12-39-18, NWNE Sec 12 T39N R18W, Dolores County, Form 2A (#400066003) Review

Dave, in response to your e-mail:

1. Yes; it is ok for you to indicate the flare pit as a special purpose pit on the Form 2A. I am aware of the requirement to fill out a Form 15 and will do so prior to construction. I don't send them right away as we rarely construct them and in working with Karen Spray, we wait until we get closer to drilling as this area is still so exploratory.
2. Yes, make the change.
COA 4 – OK
COA 5 – OK
3. COA 6 – BBC lines pits according to the 900 Series rules and will line the reserve pit and the freshwater pond accordingly.
COA 23 – OK
COA 38 – OK

Elaine Winick

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, June 08, 2010 12:37 PM
To: Elaine Winick
Subject: Bill Barrett Corp, Cox 2-12-39-18, NWNE Sec 12 T39N R18W, Dolores County, Form 2A (#400066003) Review

Elaine,

I have been reviewing the Cox 2-12-39-18 **Form 2A** (#400066003). COGCC requests the following clarifications regarding the data Bill Barrett has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 5):** The construction layout drawings (Figure 1) indicate that there will be a separate flare pit located southwest of the reserve pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 1093 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent streams (including ephemeral streams and drainages), as well as, perennial streams. COGCC's review indicates there is an

intermittent stream located approximately 217 feet to the west (also shown on the Hydrology Map). I can make the change if you send me an email with this request. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**; therefore, 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. **General:** Due to the potentially permeable nature of the surface material and the underlying bedrock in this area, the following conditions of approval (COAs) will apply:

COA 6 - Reserve pit and freshwater pit (if flowback fluids will be sent back to this 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.

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

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