

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, June 16, 2010 1:52 PM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, GGU Federal MDP #11 29-691, NENE Sec 29 T6S R91W, Garfield County, Form 2A (#400067498) Review

Scan No 2033220 CORRESPONDENCE 2A#400067498

From: Elaine Winick [mailto:EWinick@billbarrettcorp.com]
Sent: Wednesday, June 16, 2010 1:24 PM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, GGU Federal MDP #11 29-691, NENE Sec 29 T6S R91W, Garfield County, Form 2A (#400067498) Review

Thanks Dave! I concur.

Elaine

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, June 16, 2010 1:13 PM
To: Elaine Winick
Subject: RE: Bill Barrett Corp, GGU Federal MDP #11 29-691, NENE Sec 29 T6S R91W, Garfield County, Form 2A (#400067498) Review

Elaine,

I miss wrote the distance to the water well. The water well is 495 feet away based on BBC's attached Hydrology Map, so COAs 7 and 8 will apply. Thanks.

Dave

David A. Kubeczko, PG

Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission
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From: Elaine Winick [mailto:EWinick@billbarrettcorp.com]
Sent: Wednesday, June 16, 2010 1:09 PM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, GGU Federal MDP #11 29-691, NENE Sec 29 T6S R91W, Garfield County, Form 2A (#400067498) Review

Dave, in response to your e-mail:

1. COA 4 – OK
COA 5 – OK
2. The water well is 4988' away and COGCC guidelines designate as sensitive if within 660'. This water well is beyond the 660' and therefore not in close proximity so COA 7 and 8 would not apply.
3. Pipeline will follow the access Road.
4. A reference area picture will be provided.
5. COA 6 – OK
COA 23 – OK
COA 38 – OK

Elaine

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, June 16, 2010 12:03 PM
To: Elaine Winick
Subject: Bill Barrett Corp, GGU Federal MDP #11 29-691, NENE Sec 29 T6S R91W, Garfield County, Form 2A (#400067498) Review

Elaine,

I have been reviewing the GGU Federal MDP #11 29-691 **Form 2A** (#400067498). 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. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 664 feet. 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. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 18 feet bgs for a well located 4988 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 and shallow groundwater; 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 and shallow groundwater; therefore production or frac pits (if constructed) must be lined.

3. **Rule 303.d.(3).C.:** The Location Drawing (Sheet 2o of 12) should show any improvements, particularly any proposed locations of pipelines; or if the pipelines will follow the access road, then a statement to that effect is sufficient.
4. **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).
5. **General:** The following conditions of approval (COAs) will also apply:
 - COA 6** – Any pit containing fluids (if constructed) 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) 309-2514 (cell), or email. Thanks.

Dave

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

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