

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, June 16, 2010 2:50 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Mobil GM 24-27 Pad, SESW Sec 27 T6S R96W, Garfield County, Form 2A (#400069334) Review

Scan No 2033221 CORRESPONDENCE 2A#400069334

From: Kubeczko, Dave
Sent: Wednesday, June 16, 2010 2:49 PM
To: Davis, Gregory
Subject: Williams Production RMT, Mobil GM 24-27 Pad, SESW Sec 27 T6S R96W, Garfield County, Form 2A (#400069334) Review

Greg,

I have been reviewing the Mobil GM 24-27 Pad **Form 2A** (#400069334). 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. **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.

Based on the information provided in the Form 2A (sensitive area designation) 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. Williams has already listed this location as a **sensitive area** due to its proximity to surface water and possible shallow groundwater. If you have any questions regarding this email, please do not hesitate to call me at (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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5

FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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