

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, July 14, 2010 12:14 PM
To: Kubeczko, Dave
Subject: FW: Resend/Rereview of Williams Production RMT, Jolley Frac Pad KP 32-17, SWNE Sec 17 T6S R91W, Garfield County, Form 2A (#400073873) Review

Scan No 2033268 CORRESPONDENCE 2A#400073873

From: Kubeczko, Dave
Sent: Tuesday, July 06, 2010 12:29 PM
To: Davis, Gregory
Subject: Resend/Rereview of Williams Production RMT, Jolley Frac Pad KP 32-17, SWNE Sec 17 T6S R91W, Garfield County, Form 2A (#400073873) Review

Greg,

I have been reviewing the Jolley Frac Pad KP 32-17 **Form 2A** (#400073873). 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 (07/01/2010).
2. **General 317B:** The following conditions of approval (COAs) will also apply:
 - COA 6** - Frac pit must be lined (based on information from sensitive area determination, frac pit will hold fluids with hydrocarbons and/or chlorides).
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - COA 25** - Flowback to tanks only. Submit a secondary and tertiary containment plan via sundry notice Form 4 for the tanks. Attn: Dave Kubeczko. Obtain approval of the plan prior to flowback.
 - 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. This location was listed previously as a **sensitive area** due to its proximity to surface water (based on the 2009 aerial photo, there appears to be a drainage/depression leading from the south-southwest corner of the pad towards the southwest), possible shallow groundwater, and location within a 317B buffer zone (external). 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

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