

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, August 11, 2010 6:37 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Federal RGU 23-23-198 Pad, NESW Sec 23 T1S R98W, Rio Blanco County, Form 2A (#400078115) Review

Scan No 2033294      CORRESPONDENCE      2A#400078115

Received verbal concurrence of COAs from Williams on August 11, 2010.

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, July 27, 2010 9:12 AM  
**To:** jennifer.head@williams.com  
**Subject:** Williams Production RMT, Federal RGU 23-23-198 Pad, NESW Sec 23 T1S R98W, Rio Blanco County, Form 2A (#400078115) Review

Jennifer,

I have been reviewing the Federal RGU 23-23-198 Pad **Form 2A** (#400078115). 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:** Due to the highly fractured nature of the surface material in the area, the following conditions of approval (COAs) will apply:
  - COA 6** - All pits constructed to hold fluids must be lined.
  - COA 9** - Reserve pit must be lined or a closed loop system must be implemented.
  - 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 nearby surface water or any drainages leading to surface water.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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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