

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 26, 2010 1:59 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, T&T Associates LTD, PA 21-7 Pad, Lot 2 Sec 7 T7S R95W, Garfield County, Form 2A #400094539 Review

Scan No 2033484 CORRESPONDENCE 2A#400094539

From: Harris, Howard [mailto:Howard.Harris@Williams.com]
Sent: Thursday, October 14, 2010 9:49 AM
To: Kubeczko, Dave
Subject: RE: Williams Production RMT, T&T Associates LTD, PA 21-7 Pad, Lot 2 Sec 7 T7S R95W, Garfield County, Form 2A #400094539 Review

David

I am working on resolving the issues with the PA 21-7 form 2A and will get back later with you on them.. I don't think there are any problems with the proposed COA's. I have requested revised plats and should have them quickly.

As to the construction date for the pad, that should be 4/1/11.

Howard Harris
Sr. Regulatory Specialist
Williams Production RMT
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, October 11, 2010 1:29 PM
To: Harris, Howard
Subject: Williams Production RMT, T&T Associates LTD, PA 21-7 Pad, Lot 2 Sec 7 T7S R95W, Garfield County, Form 2A #400094539 Review

Howard,

I have been reviewing the T&T Associates LTD, PA 21-7 Pad **Form 2A** (#400094539). COGCC requests the following clarifications regarding the data Williams RMT has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Construction (Section 6):** The date for construction (04/01/2010) appears to be incorrect since the construction date has already passed. Can you confirm the estimated construction schedule and date. I can make the change if you send an email with this request.
2. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map #3 – Arvada loam, 1 to 6 percent slopes. COGCC's review indicates that the well pad extends onto a different soil type; Map #72 – Wann sandy loam, 1 to 3 percent slopes (COGCC has attached this report). This information is very helpful to our reclamation inspectors during the interim reclamation period.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 453 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which

Williams has already indicated on the Form 2A); therefore, the following conditions of approval (COAs) will apply:

COA 4 - Location is in a sensitive area because of its 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.

4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 56 feet bgs for a well located 784 feet from the proposed well pad. Based on the surface geology (alluvium consisting of sands and gravels) this is considered a **sensitive area**. The following condition of approval (COA) will apply:

COA 7 - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or a closed loop system (which Williams has already indicated on the Form 2A) must be implemented.

5. **Rule 303.d.(3).C.:** The Location Drawing (Plat 6) should show the 400-foot buffer from the edge of surface disturbance (there is no line shown on this attachment), as well as any improvements, particularly any proposed locations of pipelines (gas, oil, and water); or if the pipelines will follow the access road, then a statement to that effect is sufficient. Williams needs to provide COGCC with a revised location drawing showing the 400-foot buffer line.
6. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are Non-Crop Land (Rangeland), a reference area needs to be indicated either on a topographic map (reference area needs to be selected at time of permitting) or in the comments section if the reference area is adjacent to the proposed pad. The reference area map provided (Plat 5D) does not indicate where the reference area is. Williams needs to provide COGCC with a revised reference area map (topographic map) showing the reference area.
7. **General 317B:** Since the location falls within a 317B buffer zone, the following conditions of approval (COAs) will also apply:

COA 9 - If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad and frac pad locations will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

COA 25 - Flowback to tanks only. Flowback and stimulation fluids shall be contained within tanks that are placed on the frac pad in an area with additional downgradient perimeter berming. Operator must submit a secondary and tertiary containment plan via sundry notice Form 4 for the tanks to Dave Kubeczko. Operator must obtain approval of the plan prior to fracing flowback operations.

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 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.

COA 47 - The area of the frac pad where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 73 - Operator will conduct regular inspections of equipment for leaks and equipment problems with appropriate documentation retained in the operator's office. All equipment deficiencies shall be corrected. Monitoring should end approximately 30 days after well completion and/or after production has been stabilized; however, timely inspections should continue during the production phase.

COA 74 - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

COGCC would appreciate your concurrence with attaching these COAs (items 3, 4, and 7) to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 5, and 6) 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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