

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 26, 2010 8:20 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Clough RWF 22-14 Pad, Lot 6 Sec 14 T6S R94W, Garfield County, Form 2A (#400099288)
Attachments: RWF 22-14 Location Drawing.pdf

Scan No 2033480 CORRESPONDENCE 2A#400099288

From: Davis, Gregory [mailto:Gregory.Davis@Williams.com]
Sent: Thursday, October 21, 2010 2:41 PM
To: Kubeczko, Dave
Cc: Mestas, April; Rider, Kent; Shoemaker, Mike
Subject: FW: Williams Production RMT, Clough RWF 22-14 Pad, Lot 6 Sec 14 T6S R94W, Garfield County, Form 2A (#400099288)

Dave,

Forgot to include the Location Drawing (3.) for this pad. I have attached it to this e-mail. I will send the remainder of these COA's to the Parachute office for their review.

Thanks,

Greg

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, October 21, 2010 12:46 PM
To: Davis, Gregory
Subject: Williams Production RMT, Clough RWF 22-14 Pad, Lot 6 Sec 14 T6S R94W, Garfield County, Form 2A (#400099288)

Greg,

I have been reviewing the Clough RWF 22-14 Pad **Form 2A** (#400099288). 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. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information and data on or attached to the Form 2A prior to passing the OGLA review.

- 1. Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 488 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.
 - COA 9** - If fluids are conveyed via pipeline, 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 43 feet bgs for a well located 2942 feet from the proposed well pad. Based on the surface geology, the following condition of approval (COA) will apply:

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

3. **Rule 303.d.(3).C.:** There was no Location Drawing attachment. The Location Drawing should show all visible improvements, particularly the proposed location of the gas and oil pipelines. The Location Drawing should also show the 400-foot radius from the edge of disturbance (this line should be shown prominently of the drawing). Williams RMT needs to provide a Location Drawing and submit it to me so I can attach it to the permit.

4. **General:** The following conditions of approval (COAs) will also apply:

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 location 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 well pad in an area with additional downgradient perimeter berming.

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.

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

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