

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, December 15, 2010 11:40 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Jolley KP 33-21 Pad, NWSE Sec 21 T6S R91W, Garfield County, Form 2A (#400110821) Review

Scan No 2033541 CORRESPONDENCE 2A#400110821

From: Kubeczko, Dave
Sent: Wednesday, December 15, 2010 11:39 AM
To: Davis, Gregory
Subject: Williams Production RMT, Jolley KP 33-21 Pad, NWSE Sec 21 T6S R91W, Garfield County, Form 2A (#400110821) Review

Greg,

I have been reviewing the Jolley KP 33-21 Pad **Form 2A** (#400110821). I will make the following changes to the Facilities (Section 5) portion of the Form 2A: 2 condensate Tanks, 4 Water Tanks, 1 Gas Pipeline, Cuttings Trench; per your email on 12-15-10. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information and data Williams RMT has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General:** The following conditions of approval (COAs) will apply:
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
 - COA 6a** - Any pit that will hold liquids [if constructed], must be lined or a closed loop system (which has been indicated on the Form 2A by Williams) 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; 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 and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area 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 58** - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.
 - 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 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. 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 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



 *Please consider the environment before printing this e-mail*