

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, December 28, 2010 8:05 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, CDOW KP 22-22 Pad, SENW Sec 22 T6S R91W, Garfield County, Form 2A (#400112308) Review

Scan No 2033542 CORRESPONDENCE 2A#400112308

From: Kubeczko, Dave
Sent: Tuesday, December 21, 2010 10:15 AM
To: Kubeczko, Dave
Subject: Williams Production RMT, CDOW KP 22-22 Pad, SENW Sec 22 T6S R91W, Garfield County, Form 2A (#400112308) Review

From: Kubeczko, Dave
Sent: Tuesday, December 21, 2010 10:13 AM
To: 'Davis, Gregory'
Subject: Williams Production RMT, CDOW KP 22-22 Pad, SENW Sec 22 T6S R91W, Garfield County, Form 2A (#400112308) Review

Greg,

I have been reviewing the Jolley KP 22-22 Pad **Form 2A** (#400112308). 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) review. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on or attached to the Form 2A prior to passing the permit.

1. **Rule 303.d.(3).A.:** There are no location photographs in the attachment for this permit. A minimum of four (4) color photographs, one (1) of the staked location from each cardinal direction. Each photograph shall be identified by: date taken, well or location name, and direction of view. I can attach these if you email them to me.
2. **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 (12/02/2010).
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 674 feet. COGCC guidelines require designating all locations within close proximity to surface water (the exact distance varies with the location and takes into consideration soil type, surface geology, initial grade/topographic slope, the grade/topographic slope adjacent to the location, vegetative cover, as well as other factors) a **sensitive area** and requiring the following conditions of approval (COAs):

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; potential option include, but are not limited to: construction of a berm or diversion dike (either around the entire well pad, portions of the well pad, or around specific vessels and/or structures); diversion/collection trenches within and/or outside of berms/dikes; site grading; or other comparable measures (i.e., BMPs associated with stormwater management) sufficiently protective of nearby surface water.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 22 feet bgs for a well located 8360 feet from the proposed well pad. Based on the well pad's proximity to nearby surface water, this water level (22 feet bgs) appears to be indicative of groundwater conditions in this area. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area**. The following conditions of approval (COA) will apply:

COA 7 - Location is in a sensitive area because of the potential for shallow groundwater; therefore either a lined drilling pit or a closed loop system must be implemented.

COA 8 - Location is in a sensitive area because of the potential for shallow groundwater; therefore production pits (including frac water flowback pits and produce water pits) must be lined.

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

COA 91 - Notify COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us; phone 970-309-2514) 48 hours prior to start of construction.

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 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.

COA 46 - The location is in an area of high runoff/run-on potential from the proposed pad area to the southwest; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during and after well pad construction, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff. Slopes with potential for runoff should be stabilized immediately following pad construction.

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*