

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 12, 2011 12:43 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Bosely SG 14-23 Pad, SWSW Sec 23 T7S R96W, Garfield County, Form 2A (#400146696) Review

Categories: Orange Category

Scan No 2033692 CORRESPONDENCE 2A#400146696

From: Kubeczko, Dave
Sent: Tuesday, April 05, 2011 3:00 PM
To: Davis, Gregory
Subject: Williams Production RMT, Bosely SG 14-23 Pad, SWSW Sec 23 T7S R96W, Garfield County, Form 2A (#400146696) Review

Greg,

I have been reviewing the Bosely SG 14-23 Pad **Form 2A** (#400146696). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 35 feet bgs for a well located 1793 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area** (which operator has indicated on the Form 2A). 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 operator has indicated on the Form 2A) must be implemented.
2. **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 23** - Operator must ensure 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 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 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 604.a.(4) around crude oil, condensate, and produced water storage tanks.

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. Thanks.

Dave

David A. Kubeczko, PG
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