

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 19, 2011 10:49 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Federal SP 13-13 Pad, NWSW Sec 13 T7S R95W, Project Rulison, Garfield County, Form 2A #400122672 Review

**Categories:** Orange Category

Scan No 2033712      CORRESPONDENCE      2A#400122672

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**From:** Kubeczko, Dave  
**Sent:** Thursday, April 14, 2011 6:00 PM  
**To:** Harris, Howard  
**Subject:** Williams Production RMT, Federal SP 13-13 Pad, NWSW Sec 13 T7S R95W, Project Rulison, Garfield County, Form 2A #400122672 Review

Howard,

I have been reviewing the Federal SP 13-13 Pad **Form 2A** (#400122672). 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. **Project Rulison:** The bottom hole locations for 7 of the 14 proposed wells are within the 3 mile radius of Project Rulison. COGCC guidelines require designating all locations drilling within Project Rulison a *sensitive area* and requiring the following conditions of approval (COAs):
  - COA 14** - Comply with all DOE Office of Legacy Management requests for sampling and analysis of natural gas and other materials associated with drilling and production.
  - 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)). Submit a secondary and tertiary containment plan via sundry notice Form 4 for the tanks to Dave Kubeczko via email ([dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the Project Rulison COGCC mailbox ([rulison.submittal@state.co.us](mailto:rulison.submittal@state.co.us)) and obtain approval of the plan prior to flowback.
  - COA 31** - Produced water from this location may not be transported to or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison Sampling and Analysis Plan (SAP).
  - COA 32** - Drill solids and cuttings from this location may not be transported to, disposed of or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison Sampling and Analysis Plan (SAP).
  - COA 33** - A closed loop mud system shall be utilized to ensure containment of all materials that have been in contact with downhole strata and fluids. All cuttings and fresh make up water storage pits shall be lined to ensure containment. Contour features, french drains and other stormwater BMPs as necessary shall be employed to ensure site integrity.

**COA 34** - No individual operator shall utilize more than one rig within one mile of the Project Rulison blast site at any given time and no individual operator shall utilize more than two rigs within a three mile radius of the site at any given time. The total number of rigs allowed by all operators within three miles of the site shall be limited to five at any given time.

**COA 35** - Operator shall comply with all provisions of the most recent COGCC approved revision of the Rulison Sampling and Analysis Plan (SAP). In addition to the produced water sampling and analysis outlined in section 5.8 of the plan the operators shall also obtain and analyze produced water samples on wells described in the plan for constituents listed in the plan using the specified method where applicable.

**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.

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

**COA 91** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)), the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)); and the Project Rulison COGCC mailbox ([rulison.submittal@state.co.us](mailto:rulison.submittal@state.co.us)) 48 hours prior to start of construction.

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

**COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.

**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.

**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.

3. **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 (04/13/2011).

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**  
**Oil and Gas Location Assessment Specialist**

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