

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 19, 2010 9:47 AM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Circle B Land Tract 5, 21-692, SWNE Sec 21 T6S R92W, Garfield County, Form 2A (#400070465) Review

Scan No 2033460 CORRESPONDENCE 2A#400070465

From: Elaine Winick [mailto:EWinick@billbarrettcorp.com]
Sent: Wednesday, September 29, 2010 1:41 PM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, Circle B Land Tract 5, 21-692, SWNE Sec 21 T6S R92W, Garfield County, Form 2A (#400070465) Review

Dave – I think I covered everything here.

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, September 29, 2010 1:32 PM
To: Elaine Winick
Subject: Bill Barrett Corp, Circle B Land Tract 5, 21-692, SWNE Sec 21 T6S R92W, Garfield County, Form 2A (#400070465) Review

Elaine,

I have been reviewing the Circle B Land Tract 5, 21-692 **Form 2A** (#400070465). COGCC requests the following clarifications regarding the data Bill Barrett has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Facilities (Section 5):** The Form 2A indicates that a drilling pit will be constructed; however, Bill Barrett has indicated that a closed loop system will be used. Can you confirm what this pit may be used for or if this pit will not be constructed. I can make the change if you send an email with this request.

We will be using a closed loop system for drilling, we will also have a lined pit for completion purposes. Elaine

DRILLING PITS shall mean those pits used during drilling operations and initial completion of a well, and include:

COMPLETION PITS used to contain fluids and solids produced during initial completion procedures, and not originally constructed for use in drilling operations.

2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 91 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**; therefore, the following conditions of approval (COAs) will apply:
COA 4 - Location is in a sensitive area because of 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; 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., BMPs associated with stormwater management) sufficiently protective of the nearby surface

water. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

OK - Elaine

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

OK – Elaine

3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 42 feet bgs for a well located 34 feet from the proposed well pad. COGCC's guidelines require designating all locations within close proximity within 1/8 of a mile (660 feet) of a domestic water well a ***sensitive area***. The following conditions of approval (COAs) will apply:
- COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system (which Bill Barrett has already indicated on the Form 2A) must be implemented. OK - Elaine
 - COA 8** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore production, completion, or frac pits (if constructed) must be lined. OK - Elaine
4. **General:** Due to the potentially fractured nature of the surface material in the area, the following conditions of approval (COAs) will also apply:
- COA 6** – Any pit containing fluids (if constructed) must be lined or closed loop system (which Bill Barrett has already indicated on the Form 2A) must be implemented during drilling. OK - Elaine
 - 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. OK - Elaine
 - 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. OK - Elaine
 - COA 44** - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water. OK - Elaine

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