

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, May 26, 2010 3:52 PM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Federal (MDP Pad #13) 32A-20-691, SENW Sec 20 T6S R91W, Garfield County, Form 2A (#400060976) Review
Attachments: Loc Photos.pdf

Scan No 2033175 CORRESPONDENCE 2A#400060976

From: Tracey Fallang [mailto:tfallang@billbarrettcorp.com]
Sent: Wednesday, May 26, 2010 3:38 PM
To: Kubeczko, Dave
Subject: RE: Bill Barrett Corp, Federal (MDP Pad #13) 32A-20-691, SENW Sec 20 T6S R91W, Garfield County, Form 2A (#400060976) Review

Dave, in response to your e-mail:

1. COA 23 – OK
 2. COA 4, 5 – OK
 3. Loc photos attached
 4. COA 6, 38 - OK
-

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, May 26, 2010 3:26 PM
To: Tracey Fallang
Subject: Bill Barrett Corp, Federal (MDP Pad #13) 32A-20-691, SENW Sec 20 T6S R91W, Garfield County, Form 2A (#400060976) Review

Tracey,

I have been reviewing the Federal (MDP Pad #13) 32A-20-691 **Form 2A** (#400060976). COGCC requests the following clarifications regarding the data Bill Barrett Corp has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Facilities (Section 4):** Since 30 (500 bbls) temporary frac tanks will be onsite, the following condition of approval (COA) will apply:
COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1477 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates there is an intermittent stream located approximately 286 feet to the northwest (as shown on the Hydrology Map attachment). I can make the change if you send me an email with this request. 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**. 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.

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

3. **Rule 303.d.(3).A.:** A minimum of four (4) color photographs, one (1) of the stake location from each cardinal direction. Each photograph shall be identified by: date taken, well or location name, and direction of view. There are no location photos attached to the Form 2A permit. Can you please email me the location photos so I can attach them to the permit.

4. **General 317B:** The following conditions of approval (COAs) will also apply:

COA 6 - Reserve pit must be lined or closed loop system must be implemented during drilling.

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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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