

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, July 19, 2011 5:01 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Chevron TR 11-1-698 Pad, NWSW Sec 1 T6S R98W, Garfield County, Form 2A (#400179695) Review

Categories: Orange - Operator Correspondence

Scan No 2033940 CORRESPONDENCE 2A#400179695

From: Kubeczko, Dave
Sent: Tuesday, July 12, 2011 5:08 PM
To: 'howard.harris@williams.com'
Subject: Williams Production RMT, Chevron TR 11-1-698 Pad, NWSW Sec 1 T6S R98W, Garfield County, Form 2A (#400179695) Review

Howard,

I have been reviewing the Chevron TR 11-1-698 Pad **Form 2A** (#400179695). 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. **General:** COGCC's review indicates that the well pad location is within the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, this location will be designated a **sensitive area**; and the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit (or any other pit used to contain/hold fluids) must be lined or a closed loop system must be implemented during drilling.
 - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.
 - 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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.
 - 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 99 - Operator must comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements.

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

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