

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, August 29, 2011 1:12 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Federal GR 23-11V Pad, NESW Sec 11 T7S R96W, Garfield County, Form 2A (#400194436) Review

**Categories:** Orange - Operator Correspondence

Scan No 2033975      CORRESPONDENCE      2A#400194436

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**From:** Kubeczko, Dave  
**Sent:** Monday, August 29, 2011 1:11 PM  
**To:** Davis, Gregory  
**Subject:** Williams Production RMT, Federal GR 23-11V Pad, NESW Sec 11 T7S R96W, Garfield County, Form 2A (#400194436) Review

Greg,

I have been reviewing the Federal GR 23-11V Pad **Form 2A** (#400194436). 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. **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 6a** - Any pit constructed to hold liquids, must be lined or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling.
  - 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, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. 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.

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. **In addition, could Williams provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location.** 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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