

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, October 19, 2011 4:31 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Federal RG 24-14-298 Pad, SESW Sec 14 T2S R98W, Rio Blanco County, Form 2A (#400199291) Review

Categories: Orange - Operator Correspondence

Scan No 2034038 CORRESPONDENCE 2A#400199291

From: Kubeczko, Dave
Sent: Monday, October 10, 2011 12:01 PM
To: 'howard.harris@williams.com'
Subject: Williams Production RMT, Federal RG 24-14-298 Pad, SESW Sec 14 T2S R98W, Rio Blanco County, Form 2A (#400199291) Review

Howard,

I have been reviewing the Federal RG 24-14-298 Pad **Form 2A**#400199291, (previously reviewed and approved Form 2A#400086936). All COAs from the original approval remain in effect for this location:

COA 9 - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.

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

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.

Additionally, COGCC would like to attach the following additional 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 also 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 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.

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

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