

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, January 27, 2012 7:37 AM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Spruce Creek Production Pit, SWSW Sec 4 T7S R94W, Rio Blanco County, Form 2A (#400231362) Review

Categories: Orange - Operator Correspondence

Scan No 2034133 CORRESPONDENCE 2A#400231362

From: Kubeczko, Dave
Sent: Wednesday, January 25, 2012 7:55 AM
To: 'howard.harris@williams.com'
Subject: Williams Production RMT, Spruce Creek Production Pit, SWSW Sec 4 T7S R94W, Rio Blanco County, Form 2A (#400231362) Review

Howard,

I have been reviewing the Spruce Creek Production Pit **Form 2A** (#400231362). COGCC will attach the following conditions of approval (COAs) to the Form 2A permit based on the data Williams 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 90** - Notify COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to start of construction of the pad and pit.
 - COA 22** - After installation of the uppermost liner and prior to operating the pit, the synthetic liner(s) shall be tested by filling the pit with at least 4 feet of fresh water, measured from the base of the pit (not to exceed the 2-foot freeboard requirement). The operator shall monitor the pit for leaks for a period of 72 hours prior to draining the pit and commencing operations. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) 48 hours prior to start of the hydrotest. Hydrotest monitoring results must be maintained by the operator for the life of the pit and provided to COGCC prior to using the pit.
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at the water handling facility site during natural gas development activities and 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 buried or temporary surface pipelines.
 - 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 47** - The production pit must be double-lined. The pit will also require a leak detection system (Rule 904.e).

COA 48 - Operator must submit a professional engineer (PE) approved/stamped as-built drawing (plan view and cross-sections) of the production pit within 14 calendar days of construction.

COA 49 - The production pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels.

COA 11 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface pipelines or configuration of the permanent pipeline network.

COA 27 - Submit additional disposal facilities (wells, pits, landfills, etc.) for pit contents, if different than what was provided on the Form 15 Pit Permit, to COGCC via a Form 4 Sundry prior to disposal.

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. These COAs, along with additional COAs if warranted, will also be attached to the Form 15 Pit Permit. If you have any questions, 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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