

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, February 15, 2012 1:24 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Spruce Creek Production Pit, SWSW Sec 4 T7S R94W, Rio Blanco County, Form 2A (#400231362) and Form 15 (ID#427583) Review

**Categories:** Orange - Operator Correspondence

**Scan No 2034145      CORRESPONDENCE      2A#400231362**

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, February 15, 2012 1:23 PM  
**To:** 'howard.harris@williams.com'  
**Cc:** 'Blaney, Karolina'  
**Subject:** FW: Williams Production RMT, Spruce Creek Production Pit, SWSW Sec 4 T7S R94W, Rio Blanco County, Form 2A (#400231362) and Form 15 (ID#427583) Review

Howard,

I have revised COA 22 to allow for use of fresh and/or produce water for the hydrotest and monitoring of the leak detection system during the entire test. Based on my conversation with Karolina, Williams has agreed to these COAs. The Form 2A and Form 15 pit permit will be passed today, 02-15-2012. Thanks.

Dave

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

Colorado Oil & Gas Conservation Commission  
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**From:** Kubeczko, Dave  
**Sent:** Tuesday, February 14, 2012 1:38 PM  
**To:** 'howard.harris@williams.com'; 'Blaney, Karolina'  
**Subject:** Williams Production RMT, Spruce Creek Production Pit, SWSW Sec 4 T7S R94W, Rio Blanco County, Form 2A (#400231362) and Form 15 (ID#427583) Review

Howard,

I have been reviewing the Spruce Creek Production Pit **Form 15** (Facility ID#427583). COGCC would like to attached the following revised (COA 22, change in volume [from 4 feet of fresh water to 12 feet of fresh] for the hydro test) and additional conditions of approval (COAs) (COAs 67, 66, and 19; yellow highlighted text) to the Form 2A permit and the Form 15 permit based on the data Williams has submitted on or attached to the Form 2A and the Form 15 pit Permit prior to passing the Oil and Gas Location Assessment (OGLA) review.

**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 12 feet of fresh and/or produced 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. The leak detection system must also be monitored during the entire test. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubiczko; email [dave.kubiczko@state.co.us](mailto:dave.kubiczko@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 67** - In lieu of conducting an initial hydrostatic test of the pit, the operator can monitor fluid levels in the pit continuously using a minimum of two pressure transducers located at the upgradient and downgradient ends of the pit (based on the original topographic profile). These pressure transducers should be linked to the operator's SCADA system such that they can be remotely monitored. In addition, the pit liner will be marked at the two foot freeboard depth line so that operations personnel (as well as COGCC inspectors) can easily verify that the required fluid free board is being maintained. The electronically collected water level measurement data shall be used to confirm changes in pit inflow and outflow during operations based on estimates from truck and/or pipeline delivery or removal activities. Any abnormalities that are noticed during operations will be reported to the operator's field supervisor immediately so that any necessary follow-up can be scheduled.

**COA 66** - Delivery and vacuum truck hoses will not be allowed to be placed directly onto the pit liner. Operator will construct a loading/unloading station located next to the pit, to deliver fluids to or remove fluids from the pit by truck. The loading/unloading station shall be designed and utilized to prevent hoses from being dropped into the pits and dragged over the liner, which could lead to liner damage. The loading/unloading station will be the only permitted access for manual fluids transfers to or from the pit. Vehicles will not be allowed to approach the pit any closer than the loading/unloading station. Each station will have a catch basin in case a leak occurs while operations personnel are connecting or disconnecting hoses. Signs clearly marking the truck loading/unloading station shall be provided and maintained by the operator.

**COA 19** - This production pit will comply with **Rule 902. PITS - GENERAL AND SPECIAL RULES**. e. Pits used for a period of no more than three (3) years for storage, recycling, reuse, treatment, or disposal of E&P waste or fresh water, as applicable, may be permitted in accordance with **Rule 903** to service multiple wells.

COGCC would appreciate your concurrence with attaching these revised and additional COAs to the Form 2A permit and Form 15 pit permit prior to passing the OGLA review. As soon as we receive your reply, COGCC can pass both permits. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

**David A. Kubiczko, PG**  
**Oil and Gas Location Assessment Specialist**

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**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](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto: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](mailto: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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