

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, February 22, 2012 2:53 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, AP 21-20-695 Pad, NENW Sec 20 T6S R95W, Garfield County, Form 2A (#400227346) Review

Categories: Orange - Operator Correspondence

Scan No 2034157 CORRESPONDENCE 2A#400227346

From: Kubeczko, Dave
Sent: Thursday, February 16, 2012 3:49 PM
To: 'howard.harris@williams.com'
Subject: Williams Production RMT, AP 21-20-695 Pad, NENW Sec 20 T6S R95W, Garfield County, Form 2A (#400227346) Review

Howard,

I have been reviewing the AP 21-20-695 Pad **Form 2A** (#400227346). 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 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, and maintained in good condition.
 - COA 46** - Due to the steep slopes to the west and east, this location is in an area of moderate to high run off/run on potential; therefore appropriate BMPs need to be in place both during and after well pad construction, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.
 - 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. 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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