

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Saturday, March 17, 2012 2:16 PM
To: Kubeczko, Dave
Subject: FW: Williams Production RMT, Eaton GM 41-4 Pad, Lot 1 Sec 4 T7S R96W, Garfield County, Form 2A (#400254799) Review

Categories: Orange - Operator Correspondence, Brown - 2A Review Email to Operator

Scan No 2034190 CORRESPONDENCE 2A#400254799

From: Kubeczko, Dave
Sent: Saturday, March 17, 2012 2:14 PM
To: 'greg.j.davis@williams.com'
Subject: Williams Production RMT, Eaton GM 41-4 Pad, Lot 1 Sec 4 T7S R96W, Garfield County, Form 2A (#400254799) Review

Greg,

I have been reviewing the Eaton GM 41-4 Pad **Form 2A** (#400254799). COGCC would like to attach the following conditions of approval (COAs) based on the information 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 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent 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.
 - 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, if drill cuttings are to remain/disposed of onsite, they must also meet the applicable standards of table 910-1.
 - COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.
 - COA 6** - A closed loop system must be implemented during drilling.
 - COA 46** - Due to the steep slopes to the southeast, this location is in an area of moderate to high run off/run on potential; therefore the pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after well pad construction completion, 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.

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

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