

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 25, 2010 5:37 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Williams Production RMT, Federal PA 22-21, SENW Sec 21 T6S R95W, Garfield County, Form 2A (#400056960) Review  
**Attachments:** SKMBT\_C45110050413090.pdf

Scan No 2033171      CORRESPONDENCE      2A#400056960

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**From:** Harris, Howard [mailto:Howard.Harris@Williams.com]  
**Sent:** Tuesday, May 04, 2010 1:14 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Williams Production RMT, Federal PA 22-21, SENW Sec 21 T6S R95W, Garfield County, Form 2A (#400056960) Review

Dave

Attached is a plan of development for the PA 22-21 pad showing the pipe line route. It does pretty well follow the access road. I hope this satisfies rule 303.d.(3).c

Also For COA 38 & 39, Williams concurs with attaching these COA's to the form 2A permit. These are pretty well standard operating procedures for us.

I hope this will satisfy your concerns and allows for passing of the permits. Let me know if you need anything else.

Howard Harris

Sr. Regulatory Specialist

Williams Production RMT

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, April 30, 2010 1:54 PM  
**To:** Harris, Howard  
**Subject:** Williams Production RMT, Federal PA 22-21, SENW Sec 21 T6S R95W, Garfield County, Form 2A (#400056960) Review

Howard,

I have been reviewing the Federal PA 22-21 **Form 2A** (#400056960). COGCC requests the following clarifications regarding the data Williams has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Rule 303.d.(3).C.:** Neither the Location Drawing (Plat 6) nor the scaled Construction Layout Drawings (Plat 2) show the location of the existing/proposed gas and water pipelines. One of these drawings should show the existing/anticipated locations of these facilities. In lieu of amending one of these drawings, if the pipelines follow the access road, a statement in the comments section would be acceptable. I can add that statement if you send me an email with this request.
2. **General:** The following conditions of approval (COAs) will also apply:

**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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

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

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