

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, January 21, 2010 8:19 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), Federal 20-11 (PN20), SESW sec 20 T7S R95W, Garfield County, Form 2A (#400020341) Review
Attachments: Form 2A Construction Layout.pdf

Scan No 2032775 CORRESPONDENCE 2A#400020341

From: Spector, DeAnne M. [mailto:DeAnne.Spector@encana.com]
Sent: Monday, January 18, 2010 1:45 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), Federal 20-11 (PN20), SESW sec 20 T7S R95W, Garfield County, Form 2A (#400020341) Review

Dave,

My responses are in Red below.

Thank you

DeAnne

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, January 14, 2010 12:44 PM
To: Spector, DeAnne M.
Subject: EnCana Oil & Gas (USA), Federal 20-11 (PN20), SESW sec 20 T7S R95W, Garfield County, Form 2A (#400020341) Review

DeAnne,

I have been reviewing the Federal 20-11 (PN20) (#400020341) **Form 2A**. COGCC requests the following clarifications regarding the data EnCana Oil & Gas has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The dates for construction and interim reclamation appear to be too far apart. Since only 10 wells are planned to be drilled and completed at this pad, 25 months seems like a long time between drilling/completion and the start of interim reclamation. COGCC guidelines require that interim reclamation begins 6 months after well drilling/completion on non crop land. Can you confirm the estimated drilling/completion schedule and these dates. I can make the change (if necessary) if you send an email with this request. **This well is scheduled to be drilled in 2010, but I don't have an exact date yet. Can reclamation date be 8/2011? That would allow for construction, drilling, completion, etc.**
2. **Cultural (Section 9):** Form 2A indicates that the distance to the nearest public road is 3 miles (15840 feet) and railroad is 2 miles (10560 feet). COGCC's review indicates that the distance to the nearest public road (County Rd 300) is 4035 feet to the northwest and the distance to the nearest railroad is 13992 feet to the northwest. I can make the changes if you send me an email with this request.

Distance to public road = .6 miles

Distance to RR = 2.6 mi.

3. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 87 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):

COA 4 - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

Ok

4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 5121 feet bgs for a well located 3655 feet from the proposed pad. COGCC's review did not find any water well within this distance with any available information. COGCC's review did find one water well (Permit No. 119549-A-Cook, domestic well) located 1508 feet to the southeast, with a total depth of 155 feet bgs, a depth to groundwater of 90 feet bgs, and a pumping rate of 1 gpm. I believe this well may be more representative of the groundwater conditions at this location. If you can confirm the information you provided on the Form 2A, then the data will be accepted. If you cannot confirm the information, I can make the change if you send me an email with this request.

Cook domestic well = 1508' to SE, 90' bgs

1. **Rule 303.d.(3).C.:** Neither the Addendum to Legal Plats for PN-20-7-95 Well Pad (Sheet 1e of 10) nor the scaled construction layout drawing (Sheet 3 of 10) show the location of the existing/proposed gas pipelines. One of these drawings should show the anticipated locations of these new facilities. In addition, a scaled location drawing showing all visible improvements (pipelines, etc.) within 400 feet from the edge of surface disturbance needs to be included.

Revised construction layout is attached.

2. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference area needs to be indicated either on a topographic map (the attached reference area map appears to show the well pad but no reference area) or in the comments section if the reference area is adjacent to the proposed pad. In addition, four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (12/09/2009) unless the reference area is adjacent to the proposed pad and vegetation can be seen on the location pictures. If you can confirm that the reference area is adjacent to the pad and in what direction, I can make the change if you send an email with this request; otherwise, a revised reference area map is needed.

The reference area is next to the Pad, to the North. Reference area photos have been requested from the field to be taken during the growing season.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed. 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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