

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, May 17, 2010 1:30 PM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), Andy's Mesa Federal 75, SESE Sec 28 T44N R16W, San Miguel County, Form 2A (#2581726) Review

Scan No 2033115 CORRESPONDENCE 2A#2581726

From: Croteau, Jevin [mailto:Jevin.Croteau@encana.com]
Sent: Wednesday, April 21, 2010 12:06 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), Andy's Mesa Federal 73, NESW Sec 28 T44N R16W, San Miguel County, Form 2A (#2581713) Review

Dave,

Regarding the statements below for the subject well and our Andy's Mesa Fed #75 & #76 we can agree to COA5 but can not agree that these locations are in a sensitive area and that the area is vulnerable to any potential significant adverse groundwater impacts, due to factors such as the presence of shallow groundwater or pathways for communication with deeper groundwater; proximity to surface water, including lakes, rivers, perennial or intermittent streams, creeks, irrigation canals and wetlands.

For clarification I measured the distances to the nearest surface water for each Form 2A, a small pond or hole that collects runoff. The distance I measured on the Hydrology / Topo Map would be to a wash, arroyo or ephemeral stream not an intermittent or perennial stream.

I hope that helps clarify what you need. If you have any other questions, please let me know.

Jevin

From: Kubeczko, Dave
Sent: Monday, April 19, 2010 4:59 PM
To: Croteau, Jevin
Subject: EnCana Oil & Gas (USA), Andy's Mesa Federal 75, SESE Sec 28 T44N R16W, San Miguel County, Form 2A (#2581726) Review

Jevin,

I have been reviewing the Andy's Mesa Federal 75 **Form 2A** (#2581726). 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 (OGLA).

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 4792 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent, as well as, perennial streams. COGCC's review indicates there is an intermittent stream located approximately 123 feet to the southeast (as shown on the attached Hydrology Map). I can make the change if you send me an email with this request. In addition, COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area**. The following conditions of approval (COAs) will apply:

COA 4 - Location is in a sensitive area because of 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.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the depth to groundwater to be 150 feet bgs for a well located 7234 feet from the proposed well. Based on previous drilling information from nearby wells, the potential exists for surface releases to reach groundwater due to the potentially permeable nature of the unconsolidated materials and underlying fractured bedrock in this area; therefore, the following condition of approval (COA) will apply:

COA 2 - Location may be in a sensitive area due to potential impact to shallow groundwater; therefore if drilling pits intercept groundwater the pit must be lined or a closed loop system must be used.

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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