

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, September 02, 2010 11:33 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), CB Federal A28 6100 Pad, NENE Sec 28 T6S R100W, Garfield County, Form 2A (#400083420) Review

Scan No 2033340 CORRESPONDENCE 2A#400083420

From: Walter, Judith [mailto:Judith.Walter@encana.com]
Sent: Tuesday, August 24, 2010 9:02 AM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), CB Federal A28 6100 Pad, NENE Sec 28 T6S R100W, Garfield County, Form 2A (#400083420) Review

Good Morning Dave, We have reviewed items 1-4 and concur with the COA's you have suggested below. I also received the Reference Area Map and Photo's from our field staff experts. I will upload those today to the COGCC web site, so that should take care of item 3.

Thank you for your quick review of the Form 2A, we look forward to the approval.

Regards, Judy
Judy Walter
Regulatory Analyst
Encana Oil & Gas (USA) Inc.
Office: 720-876-3702
Cell: 720-635-5260
judith.walter@encana.com
"Encana's Office is closed the 1st and 3rd Friday of every month"

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, August 16, 2010 4:58 PM
To: Walter, Judith
Subject: EnCana Oil & Gas (USA), CB Federal A28 6100 Pad, NENE Sec 28 T6S R100W, Garfield County, Form 2A (#400083420) Review

Judith,

I have been reviewing the CB Federal A28 6100 Pad **Form 2A** (#400083420). COGCC requests the following clarifications regarding the data EnCana has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 100 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review indicates an intermittent stream located approximately 345 feet to the northeast, which feeds into Roan Creek to the south. COGCC guidelines require designating all locations within close proximity to surface water 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 (intermittent stream to the northeast that feeds into Roan Creek to the south); therefore, 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., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

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

2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 3 feet bgs for a well located 9273 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area**. The following conditions of approval (COA) will apply:

COA 3 - Location may be in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location may be in a sensitive area because of shallow groundwater; therefore any pits containing fluids (if constructed) must be lined.

3. **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 (reference area needs to be selected at time of permitting) 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 (08/10/2010) unless the reference area is adjacent to the proposed pit and vegetation can be seen on the location pictures. EnCana needs to provide COGCC with either a topographic map showing the reference area and color pictures within 12 months, or a statement indicating in which direction from the proposed pad the reference area is located. I can make the change if you send an email with this request.

4. **General:** Due to the potentially permeable and fractured nature of the surface materials in the area, the following conditions of approval (COAs) will apply:

COA 6 - All pits containing fluids (if constructed; reserve pit, production pit, frac pit) must be lined.

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 (items 1, 2, and 4) to the Form 2A permit prior to passing the OGLA review. The other issue (item 3) also needs to be addressed prior to permit approval. If you have any questions, 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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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