

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, October 11, 2010 10:17 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), Keinath Federal 9-12H2 (C10OU) Pad, NENW Sec 10 T8S R96W, Mesa County, Form 2A (#400093481) Review

Scan No 2033446 CORRESPONDENCE 2A#400093481

From: Pfister, Miracle [mailto:Miracle.Pfister@encana.com]
Sent: Wednesday, September 29, 2010 4:00 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), Keinath Federal 9-12H2 (C10OU) Pad, NENW Sec 10 T8S R96W, Mesa County, Form 2A (#400093481) Review

Dave,

Please make the necessary changes to the form 2A for the corrected depth to groundwater as stated below. And EnCana agrees to the listed COAs stated below.

Thanks,

Miracle Pfister
Regulatory Analyst
EnCana Oil & Gas (USA) Inc
720-876-3761 office
303-419-5294 cell

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, September 21, 2010 4:45 PM
To: Pfister, Miracle
Subject: EnCana Oil & Gas (USA), Keinath Federal 9-12H2 (C10OU) Pad, NENW Sec 10 T8S R96W, Mesa County, Form 2A (#400093481) Review

Miracle,

I have been reviewing the Keinath Federal 9-12H2 (C10OU) Pad **Form 2A** (#400093481). 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).

1. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map #55 - Potts loam, 3 to 6 percent slopes. In the future, COGCC would appreciate the more detailed "Map Unit Description" report be attached to the Form 2A permit (COGCC has attached this report).
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 543 feet. 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; 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 sufficiently protective of nearby surface water. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.

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

3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 0 feet bgs for a well located 2307 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 254697-Satterfield, domestic well) located 2601 feet to the east, with a total depth of 125 feet bgs, a depth to groundwater of 78 feet bgs, and a pumping rate of 15 gpm. I believe this well is indicative of groundwater conditions in this area. I can make the change if you send me an email with this request.
4. **General:** The following conditions of approval (COAs) will apply:
 - COA 6** - Reserve pit (if constructed) must be lined or closed loop system (which EnCana has already indicated on the Form 2A) must be implemented during drilling.
 - 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.

COGCC would appreciate your concurrence with attaching these COAs (items 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

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