

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 19, 2010 9:47 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), HMU Federal 24-13A1 (D25W) Pad, NWNW Sec 25 T7S R93W, Garfield County, Form 2A (#400092622) Review

Scan No 2033461 CORRESPONDENCE 2A#400092622

From: Spector, DeAnne M. [mailto:DeAnne.Spector@encana.com]
Sent: Wednesday, September 29, 2010 2:45 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), HMU Federal 24-13A1 (D25W) Pad, NWNW Sec 25 T7S R93W, Garfield County, Form 2A (#400092622) Review

Dave,

I have clarified your questions in blue. Let me know if there are any other issues. Also, I consistently get incorrect water information from the geologists. Does the COGCC have any plans for training them on what to look for? Maybe it would be best if I do it myself?

DeAnne

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, September 29, 2010 2:18 PM
To: Spector, DeAnne M.
Subject: EnCana Oil & Gas (USA), HMU Federal 24-13A1 (D25W) Pad, NWNW Sec 25 T7S R93W, Garfield County, Form 2A (#400092622) Review

DeAnne,

I have been reviewing the HMU Federal 24-13A1 (D25W) Pad **Form 2A** (#400092622). COGCC requests the following clarifications regarding the data EnCana has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map #7 – Ascalon-Pena complex, 6 to 25 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). In addition, based on the construction layout drawings, the pad expansion may also fall within the adjacent soil type, Map #67 – Torriorthents-Rock outcrop complex, steep (which COGCC has also attached). [I agree, I ran the detailed report you requested but apparently attached the brief one by mistake.](#)
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 3580 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 1745 feet to the west. I can make the change if you send an email with this request. [Agreed](#)
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 4927 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 (which EnCana has already indicated on the Form 2A) must be implemented. [Agreed](#)

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

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 5 - Operator must implement best management practices to contain any unintentional release of fluids. [Agreed](#)

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

COA 23 - 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. [Agreed](#)

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. [Agreed](#)

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. [Agreed](#)

COGCC would appreciate your concurrence with attaching these COAs (items 3 and 4) to the Form 2A permit prior to passing the OGLA review. The other issue (item 2) 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
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