

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, January 07, 2011 11:15 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), HMU Federal 16-9C (J16W) Pad, NWSE Sec 16 T7S R93W, Garfield County, Form 2A (#400114624) Review

Scan No 2033572 CORRESPONDENCE 2A#400114624

From: Spector, DeAnne M. [<mailto:DeAnne.Spector@encana.com>]
Sent: Wednesday, January 05, 2011 5:47 PM
To: Kubeczko, Dave
Subject: Re: EnCana Oil & Gas (USA), HMU Federal 16-9C (J16W) Pad, NWSE Sec 16 T7S R93W, Garfield County, Form 2A (#400114624) Review

Wow, that is a lot of COAs. But I agree with you.. You may attach these issues as COAs.

Thank you
DeAnne

From: Kubeczko, Dave <Dave.Kubeczko@state.co.us>
To: Spector, DeAnne M.
Sent: Wed Jan 05 11:10:35 2011
Subject: EnCana Oil & Gas (USA), HMU Federal 16-9C (J16W) Pad, NWSE Sec 16 T7S R93W, Garfield County, Form 2A (#400114624) Review

DeAnne,

I have been reviewing the HMU Federal 16-9C (J16W) Pad **Form 2A** (#400114624). 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. **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, including any fluids conveyed via temporary surface pipelines.
 - COA 6** - All pits containing fluids (if constructed; reserve pit, production pit, frac pit) must be lined.
 - 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.
 - 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 to the Form 2A permit prior to passing the OGLA review. 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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