

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, January 11, 2011 11:11 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), North Parachute MF H17 696 Pad, Lot 7 Sec 17 T6S R96W, Garfield County, Form 2A (#400117052) Review

Scan No 2033586      CORRESPONDENCE      2A#400117052

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**From:** Mitchell, Heather R. [mailto:Heather.Mitchell@encana.com]  
**Sent:** Tuesday, January 11, 2011 8:04 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), North Parachute MF H17 696 Pad, Lot 7 Sec 17 T6S R96W, Garfield County, Form 2A (#400117052) Review

Dave:

Sorry for the delay on this. Encana will comply with the below COAs for the MF H17 696 pad.

Thank you!

Heather Mitchell  
Regulatory Analyst  
Encana Oil & Gas (USA) Inc.  
720-876-3070 Office  
720-375-4879 Cell  
720-876-4070 Fax  
[heather.mitchell@encana.com](mailto:heather.mitchell@encana.com)

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Saturday, January 01, 2011 2:46 PM  
**To:** Mitchell, Heather R.  
**Subject:** EnCana Oil & Gas (USA), North Parachute MF H17 696 Pad, Lot 7 Sec 17 T6S R96W, Garfield County, Form 2A (#400117052) Review

Heather,

I have been reviewing the North Parachute MF H17 696 Pad **Form 2A** (#400117052). COGCC requests the following clarifications regarding the data EnCana Oil & Gas (USA) has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) 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 450 feet. COGCC guidelines also require designating all locations within close proximity to surface water a **sensitive area** and requiring the following conditions of approval (COAs):  
**COA 4** - Location is in a sensitive area because of close 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 (i.e., best management practices (BMPs) associated with stormwater

management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 42 feet bgs for a well located 232 feet from the proposed well pad. This well has a total depth of 42 feet bgs, a depth to groundwater of 14 feet bgs, and a pumping rate of 20 gpm. I can make the change if you send an email with this request. COGCC guidelines require designating all locations with close proximity of a domestic water well (1/8 mile or 660 feet) and shallow groundwater a **sensitive area**. The following conditions of approval (COA) will apply:

**COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

**COA 8** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore, any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) must be lined.

3. **General:** The following conditions of approval (COA) will also apply:

**COA 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)). Under unforeseen upset conditions during flowback operations, operator may discharge flowback fluids directly into the pit, as needed (notice of intent to directly discharge into the pit must be sent to Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)).

**COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.

**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 3) 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**  
**Oil and Gas Location Assessment Specialist**

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