

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, February 14, 2011 9:05 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), DW P28 496 Pad, SESE Sec 28 T4S R96W, Garfield County, Form 2A (#400122006) Review

Scan No 2033621

CORRESPONDENCE

2A#400122006

02/10/2011

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**From:** Carter, Julia M [mailto:Julia.Carter@encana.com]  
**Sent:** Thursday, February 10, 2011 3:01 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), DW P28 496 Pad, SESE Sec 28 T4S R96W, Garfield County, Form 2A (#400122006) Review

Hi Dave,

Encana accepts the conditions of approval detailed below. You also have my permission to change the distance discussed in Item #1.

Please let me know if you have any questions.  
Thank you,

Julia Carter  
Regulatory Analyst  
Encana Oil & Gas (USA) Inc.  
720.876.5240 (office) | 303.819.7349 (cell)  
720.876.6240 (fax)

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, February 07, 2011 8:45 AM  
**To:** Carter, Julia M  
**Subject:** EnCana Oil & Gas (USA), DW P28 496 Pad, SESE Sec 28 T4S R96W, Garfield County, Form 2A (#400122006) Review

Julia,

I have been reviewing the DW P28 496 Pad **Form 2A** (#400122006). 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. In addition, COGCC would like to attach the following conditions of approval (COAs) to the Form 2A prior to permit approval.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 2640 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, lakes, and ponds. COGCC's review of the USGS Topographic Map and the 2009 Aerial Photograph indicate that the proposed pad location falls directly on an intermittent drainage and there is a pond located approximately 110 feet to the north-northeast. I can make the change if you send an email with this request. COGCC guidelines 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.

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

2. **General Roan Rim:** COGCC's review indicates that the well pad location is approximately 8600 feet to the north of the current edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. COGCC is currently revising the Roan Rim NTO to expand the area covered by the NTO based on the surface geology; therefore, this location will be designated a **sensitive area**. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to start of construction.

**COA 9** - Reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system (as indicated on the Form 2A Permit application by operator in Section 6. Construction) must be implemented during drilling.

**COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.

**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 (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 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.

**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)). In addition, operator must implement odor controls during fracing operations.

**COA 26** - Notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to start of fracing operations.

**COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.

3. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¼ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

**COA 6** - All pits (if constructed) must be lined.

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 1) 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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