

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, March 21, 2011 7:37 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), S. Parachute Federal PF-31 Pad, SENW Sec 31 T7S R95W, Garfield County, Form 2A (#400133659) Review

Scan No 2033650      CORRESPONDENCE      2A#400133659

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**From:** Croteau, Jevin [mailto:Jevin.Croteau@encana.com]  
**Sent:** Thursday, March 10, 2011 1:37 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), S. Parachute Federal PF-31 Pad, SENW Sec 31 T7S R95W, Garfield County, Form 2A (#400133659) Review

David,

I am okay with changing the distance to the nearest intermittent stream on the subject Form 2A to 230 feet.

I concur with attaching the following COA's you have listed below to the subject Form 2A.

I will also send you a copy of any BLM COA's placed on any of our BLM APD's when approved.

Please let me know if you have any other questions.

Best regards,

Jevin Croteau  
Encana Oil & Gas (USA) Inc.  
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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Wednesday, March 09, 2011 11:29 AM  
**To:** Croteau, Jevin  
**Subject:** EnCana Oil & Gas (USA), S. Parachute Federal PF-31 Pad, SENW Sec 31 T7S R95W, Garfield County, Form 2A (#400133659) Review

Jevin,

I have been reviewing the S. Parachute Federal PF-31 Pad **Form 2A** (#400133659). COGCC requests the following clarifications regarding the data Burlington EnCana Oil & Gas 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.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2600 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 two intermittent streams located approximately 223 feet to the north and 532 feet to the south-southwest. I can make the change if you send an email with this request.

2. **General:** The following condition of approval (COA) 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 23** - Operator must ensure 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 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)).

**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.

COGCC would appreciate your concurrence with attaching these COAs (item 2) to the Form 2A permit prior to passing the OGLA review. The other issue (items 1) also needs to be addressed prior to permit approval. In addition, could EnCana provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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