

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, March 22, 2011 12:30 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), Story Gulch Unit 8506D-25 F25 496 Pad, SENW Sec 25 T4S R96W, Garfield County, Form 2A (#400138594) Review

Scan No 2033654      CORRESPONDENCE      2A#400138594

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**From:** Mitchell, Heather R. [<mailto:Heather.Mitchell@encana.com>]  
**Sent:** Tuesday, March 22, 2011 12:11 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), Story Gulch Unit 8506D-25 F25 496 Pad, SENW Sec 25 T4S R96W, Garfield County, Form 2A (#400138594) Review

I agree to these COAs.

Thanks,

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:** Tuesday, March 22, 2011 9:01 AM  
**To:** Mitchell, Heather R.  
**Subject:** EnCana Oil & Gas (USA), Story Gulch Unit 8506D-25 F25 496 Pad, SENW Sec 25 T4S R96W, Garfield County, Form 2A (#400138594) Review

Heather,

I have been reviewing the Story Gulch Unit 8506D-25 F25 496 Pad **Form 2A** (#400138594) (previously submitted Form 2A#400017106 approved on 1/9/2010). COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the data EnCana has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General:** 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 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 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)).

**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 1) 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**

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
707 Wapiti Court, Suite 204  
Rifle, CO 81650  
Phone: (970) 625-2497x5  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)



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