

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, May 11, 2011 12:53 PM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), S. Parachute Federal PA-30 Pad, Lot 3 Sec 30 T7S R95W, Garfield County, Form 2A (#400161416) Review

Categories: Orange Category

Scan No 2033809 CORRESPONDENCE 2A#400161416

From: Croteau, Jevin [<mailto:Jevin.Croteau@encana.com>]
Sent: Wednesday, May 11, 2011 12:51 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), S. Parachute Federal PA-30 Pad, Lot 3 Sec 30 T7S R95W, Garfield County, Form 2A (#400161416) Review

David,

Please strike "Burlington" and I am good with changing the distance to the nearest surface water to 262' and good with the rest of the COA's you have listed below for the subject well.

Please let me know if you have any other questions.

Thanks,

Jevin

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Wednesday, May 11, 2011 12:19 PM
To: Croteau, Jevin
Subject: EnCana Oil & Gas (USA), S. Parachute Federal PA-30 Pad, Lot 3 Sec 30 T7S R95W, Garfield County, Form 2A (#400161416) Review

Jevin,

I have been reviewing the S. Parachute Federal PA-30 Pad **Form 2A** (#400161416). COGCC requests the following clarifications regarding the data 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 3065feet. 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 262 feet to the north and 481 feet to the southeast. 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
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