

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, August 01, 2011 8:53 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), SG D36 496 Pad, Lot 4 Sec 36 T4S R96W, Garfield County, Form 2A (#400177513) Review

Categories: Orange - Operator Correspondence

Scan No 2033943 CORRESPONDENCE 2A#400177513

From: Kubeczko, Dave
Sent: Friday, July 08, 2011 6:41 PM
To: Carter, Julia M
Subject: EnCana Oil & Gas (USA), SG D36 496 Pad, Lot 4 Sec 36 T4S R96W, Garfield County, Form 2A (#400177513) Review

Julia,

I have been reviewing the SG D36 496 Pad **Form 2A** (#400177513). COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference has been indicated on a topographic map; therefore; four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (06/27/2011).
2. **General:** COGCC's review indicates that the well pad location is approximately 5490 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. Although this well pad location does not fall within the current Roan Rim NTO boundaries, due to the highly fractured nature of the surface material in the area around the Roan Rim, this location will be designated a **sensitive area**; and the following conditions of approval (COAs) will apply:
 - COA 9** - Reserve pit (or any other pit used to contain/hold fluids) must be lined or a closed loop system 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment 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.

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, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

COA 99 - Operator must comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within $\frac{3}{4}$ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements.

COGCC would appreciate your concurrence with attaching these COAs 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

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