

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 20, 2011 1:46 PM
To: Curran, Nick
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Categories: Orange - Operator Correspondence

Scan No 2034023 CORRESPONDENCE 2A#400196689

Nick,

I assume that the pad will be manned 24/7 while fracing operations are ongoing, so visual checks would be sufficient. I will add this to the COA (see below). Thanks.

Dave

From: Curran, Nick [mailto:Nick.Curran@encana.com]
Sent: Tuesday, September 20, 2011 1:27 PM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Hi Dave,

The only issue our engineers had with the COA's is the overflow protection. Please see his comments below but the only indicator we have on the frac tanks are visual indicators which work fine when folks watch for them. Would that suffice for that COA?

Thanks,

Nick

From: Balderston, Mark
Sent: Tuesday, September 20, 2011 11:36 AM
To: Guldán, Ryan W.; Curran, Nick
Cc: Pfister, Miracle; Oates, Jason C.; Durrant, Christopher D.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Our procedures plan for this, and do everything possible to prevent this. When there is a human error or a equipment failure, there is nothing we have that can prevent these.

Our procedures when followed have prevented the overflow of tanks.

We have level indicators that are visual as an indicator, but do not prevent the tank from over filling.

From: Guldán, Ryan W.
Sent: Tuesday, September 20, 2011 11:25 AM

To: Curran, Nick

Cc: Pfister, Miracle; Oates, Jason C.; Balderston, Mark; Durrant, Christopher D.

Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Nick,

Mark is going to have to have the final say on the proposed COAs. If he is good with them I am good with them.

The one that is a slight concern to me is, Operator should provide overflow protection for each individual frac tank, but lets wait till Mark has had a chance to review them and add his comments.

Thanks!

Ryan W Guldán

Water Systems Engineer – South Piceance

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From: Curran, Nick

Sent: Tuesday, September 20, 2011 10:28 AM

To: Curran, Nick; Guldán, Ryan W.

Cc: Pfister, Miracle; Oates, Jason C.; Balderston, Mark; Durrant, Christopher D.

Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Nick,

Please see below the supplemental COAs that COGCC is suggesting to be placed on this permit (they are probably covered under EnCana's BMPs of water use for drilling and completion operations). Please review.

ORIGINAL SITE SPECIFIC COAs:

Operator must ensure 110 percent secondary containment for any volume of fluids contained at frac tank water transfer/storage site during 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 location will be stabilized, inspected at regular intervals (every 14 days at a minimum during the construction phase and at least every 30 days during operations period), and maintained in good condition.

Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or permanent buried pipelines.

SUPPLEMENTAL SITE SPECIFIC COAs:

Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any reconfiguration of the pipeline network. Operator shall maintain pipeline pressure testing records throughout operations of the water transfer facility. The records will be made available to COGCC upon request.

Operator must implement best management practices to contain any unintentional release of fluids at the water transfer facility location. Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.

Operator should provide overflow protection for each individual frac tank (site will be manned 24/7 during completion operations and period visual checks will be conducted to provide overflow monitoring of the tanks during flowback).

Operator proposes that this facility will be in operation for a period of less than three years. Should the operation of this facility continue more than three years, a Form 28 shall be submitted and approved prior to the expiration of this Form 2A.

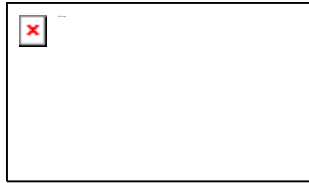
Operator shall submit by Form 4 Sundry Notice a Reuse and Recycling Plan (RRP) in accordance with: COGCC Rule 907. MANAGEMENT OF E&P WASTE; a. General requirements; (3) Reuse and recycling. Such plans shall describe, at a minimum, the type(s) of waste, the proposed use of the waste, method of waste treatment, product quality assurance, and shall include a copy of any certification or authorization that may be required by other laws and regulations.

COGCC would appreciate your concurrence with attaching these supplemental COAs to the Form 2A permit (or if EnCana would prefer, COGCC can place these as BMPs) 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
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Rifle, CO 81650
Phone: (970) 625-2497x5
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Cell: (970) 309-2514
dave.kubeczko@state.co.us



From: Curran, Nick
Sent: Tuesday, September 20, 2011 10:27 AM
To: Guldán, Ryan W.
Cc: Pfister, Miracle; Oates, Jason C.; Balderston, Mark; Durrant, Christopher D.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Ryan,

Please review these final comments from the COGCC and give me your blessing. I should be able to take care of this soon.

From: Guldán, Ryan W.
Sent: Tuesday, September 20, 2011 8:53 AM
To: Curran, Nick
Cc: Pfister, Miracle; Oates, Jason C.; Balderston, Mark; Durrant, Christopher D.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Nick, my comments are in Red, please do not send out till Mark and Chris confirm or correct the answers.

Thanks!

Ryan W Guldán
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From: Curran, Nick
Sent: Tuesday, September 20, 2011 8:01 AM
To: Guldán, Ryan W.
Cc: Pfister, Miracle; Oates, Jason C.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE

Ryan,

Here are some things they have questions regarding the frac tank pad

-do we plan on having the tanks out there for longer than 3 years? At this time we do not intend to have the tanks on location for >3 years.

-are we sending water that has been used to frack back to those tanks after completions? Yes, after completions are complete on the K20OU, we will be pumping water back to the H29OU, then immediately transferring this water back to High Mesa to be treated.

-is there an 'operations plan'? I am not too sure what exactly the question is, but we have BMP (Best Management Practices) in place for water movement for completions. This transfer pad and all transfer pads we operate follow these guidelines

-are we using biocide in the water to reduce chances of H2S? There isn't a need for biocide to be added to the water that is sent to the H29OU (it will be a combination of treated water and fresh). Biocide is added to the water when it is pumped downhole the well for the frac, so the water that comes back is already treated to reduce/eliminate H2S issues that could arise. Please wait for Mark to confirm the answer for this question.

From: Guldán, Ryan W.

Sent: Monday, September 19, 2011 11:06 AM

To: Curran, Nick

Cc: Pfister, Miracle; Oates, Jason C.

Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96
29NESE Water Transfer Pad, SENE Sec 29 T8S R96W,
Mesa County, Form 2A (#400196689) Review

Ok, sounds good.

I will be gone to the field starting Tuesday afternoon (~2 or 3 PM?). I would prefer not to have to talk to Alex directly. If you can have him email the questions that will be better. I want to have transparency in my answers with Mark/Durrant etc.

Thanks!

Ryan W Guldán

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From: Curran, Nick
Sent: Monday, September 19, 2011 11:04 AM
To: Guldán, Ryan W.
Cc: Pfister, Miracle; Oates, Jason C.
Subject: Re: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Ryan,

The environmental group from the COGCC is holding up the 2A. Alex Fischer is having additional COA's placed on this 2A that will make sure we use Biocide in the water if its being stored for too long and so forth. We have given them everything they have requested. Perhaps you can try contacting Alex directly and see if you can answer any questions he may have. I am out of the office today but will get with you tomorrow.

Thanks,
Nick

From: Guldán, Ryan W.
Sent: Monday, September 19, 2011 10:57 AM
To: Curran, Nick
Cc: Pfister, Miracle; Oates, Jason C.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Nick,

I know I am becoming a mosquito about this topic, but we have got to get this pad approved this week. The H29OU is going to play a critical role in the water balance for Orchard (helps reduce fresh water influx and keeps the completions machine moving).

Thanks!

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From: Curran, Nick
Sent: Thursday, September 15, 2011 12:58 PM
To: Guldán, Ryan W.
Cc: Pfister, Miracle; Oates, Jason C.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

I just got a call from the COGCC about this frac pad, the environmental group is now getting involved in this 2A, it looks like there will be additional COA's possibly. We definitely will not have it this week. Will let you know what they come up with.

From: Guldán, Ryan W.
Sent: Tuesday, September 06, 2011 7:52 AM
To: Curran, Nick
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Morning Nick!

How is this coming along?

Ryan W Guldán
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From: Curran, Nick
Sent: Thursday, September 01, 2011 8:46 AM
To: Guldán, Ryan W.
Cc: Pfister, Miracle; Oates, Jason C.
Subject: RE: EnCana Oil & Gas (USA), H29OU 8SR96 29NESE Water Transfer Pad, SENE Sec 29 T8S R96W, Mesa County, Form 2A (#400196689) Review

Hi Ryan,

Dave with the COGCC in Rifle is calling the DOW and seeing if they are ok with the 2 COA's he put down for us. If the DOW can sign off it will expedite things so he is looking into that for us. The DOW lost an employee recently and Dave mentioned they were unusually swamped right now because the Niobrara play is taking off in Craig and there are TONS of permits FYI. He is calling me back once he speaks with the DOW.

Thx,

Nick

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