

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, February 14, 2012 1:48 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review

**Categories:** Orange - Operator Correspondence

Scan No 2034139      CORRESPONDENCE      2A#400239295

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**From:** Croteau, Jevin [mailto:JevinRobert.Croteau@encana.com]  
**Sent:** Tuesday, February 14, 2012 1:19 PM  
**To:** Fischer, Alex; Kubeczko, Dave  
**Cc:** Deranleau, Greg; Stanczyk, Jane; Westerdale, Barbara; Robert Morris; Oates, Jason C.  
**Subject:** RE: EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review

Alex,

Thank you for the information. We except all the COA's Dave has listed below for our PH-21 pad and the subject Form 2A.

If you have any questions, please let me know.

Thanks again,

Jevin Croteau  
Encana Oil & Gas (USA) Inc.  
370 17th Street, Suite 1700  
Denver, CO 80202  
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720-273-6427 cell  
[jevin.croteau@encana.com](mailto:jevin.croteau@encana.com)

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**From:** Fischer, Alex [mailto:[Alex.Fischer@state.co.us](mailto:Alex.Fischer@state.co.us)]  
**Sent:** Tuesday, February 14, 2012 11:28 AM  
**To:** Croteau, Jevin; Oates, Jason C.  
**Cc:** Kubeczko, Dave; Deranleau, Greg; Stanczyk, Jane; Westerdale, Barbara; Robert Morris  
**Subject:** RE: EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review  
**Importance:** High

Jevin-Encana MUST comply with Revision 3 of the Rulison Sampling and Analysis Plan (RSAP). If there are deviations from the RSAP, then those deviations must be addressed with all of the stake holders involved in Project Rulison. If Encana is following the RSAP and they feel they have met the RSAP requirements, then Encana must formerly provide their request (via Sundry Form 4) with supporting documentation of such request. At that time, the Colorado Oil and Gas Conservation Commission (COGCC) will review the request.

Thanks  
Alex

Alex Fischer, P.G.  
Environmental Supervisor - Western Colorado  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203  
(303) 894-2100 ext. 5138  
(303) 894-2109 fax  
[alex.fischer@state.co.us](mailto:alex.fischer@state.co.us)

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, February 14, 2012 9:28 AM  
**To:** Fischer, Alex  
**Subject:** FW: EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review  
**Importance:** High

Alex,

Please see email from encana.

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

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Rifle, CO 81650  
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 *Please consider the environment before printing this e-mail*

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**From:** Croteau, Jevin [<mailto:JevinRobert.Croteau@encana.com>]  
**Sent:** Monday, February 13, 2012 2:41 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review

Dave,

We have received the data back from URS regarding any previous sampling data conducted per the Rulison Sampling and Analysis Plan, Revision 3 for the areas where our proposed PH-21 BHL's are located, Tier II, monitoring sectors 10 & 11 and the data shows that there are wells that have been drilled closer to the blast site in each sector and those wells have been tested and should not require additional sampling or testing in those sectors. In sector 10 Noble Energy has closer wells in Tier I and Tier II and in sector 11 Laramie Energy has closer wells in Tier II and Encana's Warren Federal 15-16BB (PI-15) well is closer.

Therefore we would like to have all the associated Project Rulison COA's listed below not included or attached to the subject Form 2A, specifically COA #14, #31, #32, #34 and #35.

If you have any questions, please let me know.

Thanks,

Jevin Croteau  
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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Friday, January 27, 2012 9:11 AM  
**To:** Croteau, Jevin  
**Subject:** EnCana Oil & Gas (USA), Federal 22-14 (PH-21) Pad, SENE Sec 21 T7S R95W, Garfield County, Form 2A (#400239295) Review

Jevin,

I have been reviewing the Federal 22-14 (PH-21) Pad **Form 2A** (#400239295). Seven bottomhole locations for the 10 wells planned at this pad are within the 3-mile limits of Project Rulison; therefore, the following conditions of approval (COAs) associated with the Project Rulison area will be attached to the Form 2A by COGCC.

1. **Project Rulison COAs:** 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 14** - Comply with all DOE Office of Legacy Management requests for sampling and analysis of natural gas and other materials associated with drilling and production.
  - 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 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 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 58** - Berms or other containment devices shall be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

**COA 31** - Produced water from this location may not be transported to or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison Sampling and Analysis Plan (SAP).

**COA 32** - Drill solids and cuttings from this location may not be transported to, disposed of or re-used at another location without specific written approval from COGCC and only after analysis confirms compliance with the Rulison Sampling and Analysis Plan (SAP).

**COA 33** - A closed loop mud system shall be utilized to ensure containment of all materials that have been in contact with downhole strata and fluids. All cuttings and fresh make up water storage pits shall be lined to ensure containment. Contour features, french drains and other stormwater BMPs as necessary shall be employed to ensure site integrity.

**COA 34** - No individual operator shall utilize more than one rig within one mile of the Project Rulison blast site at any given time and no individual operator shall utilize more than two rigs within a three mile radius of the site at any given time. The total number of rigs allowed by all operators within three miles of the site shall be limited to five at any given time.

**COA 35** - Operator shall comply with all provisions of the most recent COGCC approved revision of the Rulison Sampling and Analysis Plan (SAP). In addition to the produced water sampling and analysis outlined in section 5.8 of the plan the operators shall also obtain and analyze produced water samples on wells described in the plan for constituents listed in the plan using the specified method where applicable.

**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.

**COA 73** - Operator will conduct regular inspections of equipment for leaks and equipment problems with appropriate documentation retained in the operator's office. All equipment deficiencies shall be corrected. Monitoring should end approximately 30 days after well completion and/or after production has been stabilized; however, timely inspections should continue during the production phase.

**COA 74** - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

**COA 79** - Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

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**

Colorado Oil & Gas Conservation Commission

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