

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Wednesday, February 15, 2012 12:09 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), N. Parachute WF A15 596 Pad and Pit, NENE Sec 15 T5S R96W, Garfield County, Form 2A (#400230807) Review

**Categories:** Orange - Operator Correspondence

**Scan No 2034141      CORRESPONDENCE      2A#400230807**

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**From:** Mitchell, Heather R. [mailto:Heather.Mitchell@encana.com]  
**Sent:** Monday, January 30, 2012 9:40 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), N. Parachute WF A15 596 Pad and Pit, NENE Sec 15 T5S R96W, Garfield County, Form 2A (#400230807) Review

Thanks Dave - We agree to these COAs.

Heather Mitchell  
Regulatory Analyst  
Encana Oil & Gas (USA) Inc.  
720-876-3070 Office  
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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, January 30, 2012 6:48 AM  
**To:** Mitchell, Heather R.  
**Subject:** RE: EnCana Oil & Gas (USA), N. Parachute WF A15 596 Pad and Pit, NENE Sec 15 T5S R96W, Garfield County, Form 2A (#400230807) Review

Heather,

Sorry, a mistype. Only the Form 27 is required. I don't deal with them so not sure how they are set up. I know that some information for a Form 27 is not available sometimes, so a Form 4 can be used later to submit. I will remove the reference to the Form 4. Thanks.

Dave

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

Colorado Oil & Gas Conservation Commission  
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 *Please consider the environment before printing this e-mail*

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**From:** Mitchell, Heather R. [<mailto:Heather.Mitchell@encana.com>]  
**Sent:** Friday, January 27, 2012 2:40 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), N. Parachute WF A15 596 Pad and Pit, NENE Sec 15 T5S R96W, Garfield County, Form 2A (#400230807) Review

Dave:

Quick question on the COA 11. It sort of looks like we need to file a form to file a form. Is the Form 27 not enough to cover the closure information?

Thanks,

Heather Mitchell  
Regulatory Analyst  
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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:** Friday, January 27, 2012 9:54 AM  
**To:** Mitchell, Heather R.  
**Subject:** EnCana Oil & Gas (USA), N. Parachute WF A15 596 Pad and Pit, NENE Sec 15 T5S R96W, Garfield County, Form 2A (#400230807) Review

Heather,

I have been reviewing the N. Parachute WF A15 596 Pad and Pit **Form 2A** (#400230807). COGCC would like to attach the following conditions of approval (COAs) based on the data and information Chevron 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 11** - Prior to multi-well pit construction, a Form 27 (Remediation Workplan/Closure Report) must be submitted via a Form 4 Sundry to the COGCC detailing the closure of the original drilling pits (#425199 and #425200) at this well pad location. This form should include the dates of closure, where the fluids were disposed of, and where any impacted soil was disposed of. In addition, analytical results from soil samples collected below the pit prior to the construction of the new multi-well pit, should also be included.

**COA 90** - Notify COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email [shaun.kellerby@state.co.us](mailto:shaun.kellerby@state.co.us)) 48 hours prior to start of construction of the pit.

**COA 21** - Surface water samples from West Fork (one upstream and one downstream of the well pad/pit location) shall be collected by the operator prior to pit use and every 12 months to evaluate potential impacts from pit operations. At a minimum, the surface water samples will be analyzed for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

**COA 22** - After installation of the uppermost liner and prior to operating the pit, the synthetic liner(s) shall be tested by filling the pit with at least 4 feet of fresh water, measured from the base of the pit (not to exceed the 2-foot freeboard requirement). The operator shall monitor the pit for leaks for a period of 72 hours prior to draining the pit and commencing operations. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) 48 hours prior to start of the hydrotest. Hydrotest monitoring results must be maintained by the operator for the life of the pit and provided to COGCC prior to using the pit.

**COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at the water handling facility site during natural gas development activities and 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 buried or temporary surface pipelines.

**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 47** - The production pit must be double-lined. The pit will also require a leak detection system (Rule 904.e).

**COA 48** - Operator must submit a professional engineer (PE) approved/stamped as-built drawing (plan view and cross-sections) of the production pit within 14 calendar days of construction.

**COA 49** - The production pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels.

**COA 11** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface pipelines or configuration of the permanent pipeline network.

**COA 27** - Submit additional disposal facilities (wells, pits, landfills, etc.) for pit contents, if different than what was provided on the Form 15 Pit Permit, to COGCC via a Form 4 Sundry prior to disposal.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The Form 2A will not be passed and will be placed **"ON HOLD"** until the Form 15 has been submitted and approved. The same COAs on this Form 2A will also be placed on the Form 15. Additional COAs may also be placed on the Form 15 depending on the attachments submitted with

the pit permit. 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**

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