

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, October 03, 2012 11:18 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), J25W Water Storage Pit, NWSE Sec 25 T7S R93W, Garfield County, Form 2A#400309793 and Form 15#400311134 Review

Categories: Orange - Operator Correspondence

Scan No 1293007 CORRESPONDENCE 2A#400309793

From: Pfister, Miracle [mailto:Miracle.Pfister@encana.com]
Sent: Monday, September 24, 2012 3:26 PM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), J25W Water Storage Pit, NWSE Sec 25 T7S R93W, Garfield County, Form 2A#400309793 and Form 15#400311134 Review

Dave,

Hey! Here are some responses to some of the COAs listed below:

COA 66: The J25W pond will not load/unload water via truck, therefore a truck offload is not included in the design.

COA 22: The A15 only required 4 ft of water for the hydrostatic testing?

COA 67: This should not apply since we will hydro-test the pond, but the bottom part refers to electronic monitoring during operation. I assume this only applies to ponds that use pressure transducers instead of hydrostatic testing. At any rate, we have not electronic measuring associated with the pond.

Do we need to discuss?

Thanks,

Miracle Pfister
Regulatory Analyst
Encana Oil & Gas (USA) inc
720-876-3761 office
303-489-1749 cell

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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, September 21, 2012 12:53 PM
To: Pfister, Miracle
Subject: EnCana Oil & Gas (USA), J25W Water Storage Pit, NWSE Sec 25 T7S R93W, Garfield County, Form 2A#400309793 and Form 15#400311134 Review
Importance: High

Miracle,

I have been reviewing the J25W Water Storage Pit **Form 2A** #400309793 and **Form 15** #400311134. COGCC

would like to attach the following conditions of approval (COAs) based on the data EnCana 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 23 - Operator must ensure 110 percent secondary containment for any volume of fluids (excluding freshwater) 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 buried or temporary surface pipelines.

COA 47 - A form 15 Earthen Pit Permit must be submitted and approved prior to construction/use of the completions pit.

2. **Form 15 Earthen Pit Permit COAs:** The following conditions of approval (COAs) will apply to both the Form 2A and the Form 15 Earthen Pit Permit:

COA 90 - Notify the COGCC 48 hours prior to start of pad construction, pit liner installation, and start of pit operations using Form 42 (the appropriate COGCC individuals will automatically be email notified).

COA 10 - The Form 15 Earthen Pit Permit shall be good for 3 years from the date of first use. If the produced water storage pit is to be used for more than 3 years, the operator shall file with the COGCC an application on Form 28 and obtain the COGCC's approval.

COA 47 - The produced water storage pit must be double-lined. The pit will also require a leak detection system (Rule 904.e).

COA 66 - Delivery and vacuum truck hoses will not be allowed to be placed directly onto the pit liner. Operator will construct a loading/unloading station located next to the pit, to deliver fluids to or remove fluids from the pit by truck. The loading/unloading station shall be designed and utilized to prevent hoses from being dropped into the pits and dragged over the liner, which could lead to liner damage. The loading/unloading station will be the only permitted access for manual fluids transfers to or from the pit. Vehicles will not be allowed to approach the pit any closer than the loading/unloading station. Each station will have a catch basin in case a leak occurs while operations personnel are connecting or disconnecting hoses. Signs clearly marking the truck loading/unloading station shall be provided and maintained by the operator.

COA 48 - Operator shall submit as-built pit design report including pit layout (plan view and cross-sections), sub-grade preparation, liner installation QA/QC, and any testing results within 90 days of completion of pit installation.

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 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 70 percent of operating capacity of 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. The leak detection system must also be monitored during the entire test. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email 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 67 - In lieu of conducting an initial hydrostatic test of the pit, the operator can monitor fluid levels in the pit continuously using a minimum of two pressure transducers located at the upgradient and downgradient ends of the pit (based on the original topographic profile). These pressure

transducers should be linked to the operator's SCADA system such that they can be remotely monitored. In addition, the pit liner will be marked at the two foot freeboard depth line so that operations personnel (as well as COGCC inspectors) can easily verify that the required fluid free board is being maintained. The electronically collected water level measurement data shall be used to confirm changes in pit inflow and outflow during operations based on estimates from truck and/or pipeline delivery or removal activities. Any abnormalities that are noticed during operations will be reported to the operator's field supervisor immediately so that any necessary follow-up can be scheduled.

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 leading to the produced water storage pit.

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 approval of the Form 15 Earthen Pit Permit. 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 49 – The produced water storage pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed.

COA 29 - The operator shall submit, and receive approval of, a reuse and recycling plan per Rule 907.a.(3), prior to any offsite reuse/recycling of pit fluids.

COA 27 - Submit additional disposal facilities (wells, pits, etc.), if necessary (i.e., if original disposal option changes), for pit liquid contents to COGCC via a Form 4 Sundry prior to disposal.

COA 28 – The produced water storage pit shall be closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels; with an approved Site Investigation and Remediation Workplan, Form 27.

COA 91 - At the time of pit closure, operator must submit disposal information for solids, if necessary, via a Form 4 Sundry Notice to the COGCC Location Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us). The disposal method will need to be approved prior to operator starting pit closure.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A Permit and Form 15 Earthen Pit 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

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

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