

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, May 02, 2013 9:00 AM
To: dave.kubeczko@state.co.us
Subject: FW: Hunter Ridge Energy Services LLC, Divide Road Water Facility, SWSE Sec 26 T4S R96W, Garfield County, Form 2A#400378297 Review
Attachments: Ecodur Pond Work Instructions - Rev 1.01 - 11.05.2012.pdf; DRWF Project Gantt Chart (Ph I-IV).pdf
Categories: Operator Correspondence

Scan No 2106587 CORRESPONDENCE 2A#400378297

----- Forwarded message -----

From: Deranleau - DNR, Greg <greg.deranleau@state.co.us>
Date: Fri, Apr 26, 2013 at 4:16 PM
Subject: Fwd: Hunter Ridge Energy Services LLC, Divide Road Water Facility, SWSE Sec 26 T4S R96W, Garfield County, Form 2A#400378297 Review
To: Dave Kubeczko <Dave.Kubeczko@state.co.us>, Alex Fischer - DNR <alex.fischer@state.co.us>, Steve Jenkins - DNR <steve.jenkins@state.co.us>

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From: Oates, Jason C. <Jason.Oates@encana.com>
Date: Fri, Apr 26, 2013 at 3:00 PM
Subject: RE: Hunter Ridge Energy Services LLC, Divide Road Water Facility, SWSE Sec 26 T4S R96W, Garfield County, Form 2A#400378297 Review
To: "Deranleau - DNR, Greg" <greg.deranleau@state.co.us>
Cc: "Carter, Julia M" <Julia.Carter@encana.com>, "Jamie Jost (jjost@bwenergylaw.com)" <jjost@bwenergylaw.com>

Greg-

Our response to each of your concerns is outlined in red below and in the attachments on this email.

A change was made to the breakdown of the phases in our phased approach to this project to help clarify the activities occurring in each phase. The phase breakdown is as follows:

- Phase I – Initial site preparation and the construction of Tanks T-101, T-106, and T-105
- Phase II – Ancillary Equipment Installation
- Phase III – Construction of Tank T-102
- Phase IV – DAF Equipment Installation

Based on the change to the phase schedule, I am also requesting a change to the following COA:

“**COA 2A281** - Within 30 calendar days of conclusion of each proposed Phase as outlined in supplemental document #XXXXXXXXXX [document number for the phased construction approach will be assigned at a later date], operator shall submit as-built drawings, including plan view and cross-sections (with perpendicular axes), prepared and stamped by a Professional Land Surveyor or Professional Engineer and including the tank pad and access road.”

HRES Alternative COA proposal - Within 30 calendar days of conclusion of **Phase IV** as outlined in the DRWF Project Gantt Chart, operator shall submit as-built drawings, including plan view and cross-sections (with perpendicular axes), prepared and stamped by a Professional Land Surveyor or Professional Engineer and including the tank pad and access road.

Please contact me with any questions.

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1. Please provide a copy of the approved Garfield County Limited Impact Review and Land Use Change Permit for attachment to the Form 2A. **Couriered to the COGCC on 4/24.**
 2. Please provide a detailed design and description of how the secondary containment for the tanks will be made "sufficiently impermeable" as required by COGCC Rule 604.a.(4). The description of the spray on liner in the Form 28 does not provide sufficient detail to explain the process or timing of application, the material used, or what quality assurance/quality control measures will be employed. This will be attached to the Form 28. **Attachment 'Ecodur Pond Work Instructions'**
 3. With respect to the Phased Approach presented via e-mail on April 15, 2013 (attached), please provide the following clarification:
 1. The narrative description references Tanks by numbers 1-3. However the drawings provided with the Form 2A and Form 28 reference Tanks 101, 102, and 103. Please provide consistent reference information. Additionally, please include references by Tank number for the 20,000 bbl tanks. **Attached Gantt Chart (Lines 5-6, 28)**
 2. The schedule provided does refers to the "first" tank, but it is not specified which tank will be constructed first (use same references as discussed in 3.1., above).
 3. The timeframes of Phase 1 and Phase 2 overlap. What activities take place after the completion of the first tank, but before the commissioning and start-up of the facility? It is not clear from the narrative or schedule. **Gantt Chart (Lines 17-25)**
 4. The schedule provided does not explicitly include the construction or lining of the secondary containment structures. This is a significant item that should be included. **Gantt Chart (Line 22)**
 4. Due to the highly fractured nature of the surface material and "bedrock" in the vicinity of the Roan Rim and Roan Plateau, this location will be designated a **sensitive area**. The Form 2A will be modified to reflect this.

Jason Oates
Group Lead, Regulatory
South Rockies Business Unit

Encana Oil & Gas (USA) Inc.

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