From: Greg Deranleau - DNR
To: "Mitchell, Heather R."
Subject: RE: PC22 COAs - Document # 400418188
Date: Thursday, June 06, 2013 10:17:00 AM

I'm sorry, since COGCC is not approving it as requested, I was waiting for your response. I will approve it as stated below right now.

Thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
Colorado Oil and Gas Conservation Commission
303-894-2100 ext. 5153

From: Mitchell, Heather R. [mailto:Heather.Mitchell@encana.com]
Sent: Thursday, June 06, 2013 10:13 AM
To: 'Greg Deranleau - DNR'
Subject: RE: PC22 COAs - Document # 400418188

Greg – I still show this sundry as pending?

Heather Mitchell
Regulatory Analyst
720.876.3070
303.725.2694

Encana Oil & Gas (USA) Inc.
encana.com

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From: Greg Deranleau - DNR [mailto:Greg.Deranleau@state.co.us]
Sent: Thursday, May 30, 2013 11:50 AM
To: Mitchell, Heather R.; Dave Kubeczko - DNR
Cc: Chris Canfield - DNR; Kevin King - DNR
Subject: RE: PC22 COAs - Document # 400418188

Heather,

COGCC has reviewed and discussed your request for relief from COAs at the Hagen Federal 22-8A (PC22) Oil and Gas Location (Location ID 432551).

We conclude that Encana should be granted relief from the down hole COA requiring a high accuracy gyroscopic survey of the wells on this pad. If the terms of the current version of the Rullison SAP would otherwise require the survey, then the COA placed on the APDs ("comply with the SAP") would enforce that requirement.

COGCC disagrees with the request for relief from the requirements placed regarding E&P waste handling onsite and pad and road construction. The area is extremely susceptible to run-on and run-off issues and the two COAs from which you seek relief are designed to address that. E&P waste must be managed onsite to prevent its transport via stormwater as stated in the first COA, and the pad and access road must be designed and built with the high run-on/run-off as a design factor.

I have made the following comments to the Form 4 and can approve it today.

DocNum: 400418188 Status: IN PROCESS Operator: ENCANA OIL & GAS (USA) INC W/L Name: Hagen Federal 22-8A (PC22) Created: 05/14/2013 2:54:43 PM

Well/ Location | Location Change/ As-Built GPS | Formation/ Spacing | Other Changes | Reclamation | Engineering/ Environmental | Casing/ Cementing | H2S Reporting | BMP | Submit | Related Forms | Attachments | Revi

COMMENTS AND COA'S

COA	Group	User Name	Comment
☐	OGLA	DERANLEAU, GREG	COGCC concurs that COA requiring high-accuracy gyroscopic directional wellbore survey should not be applied to the Oil and Gas Location Assessment. The COA will be removed from Location ID 432551.
☐	OGLA	DERANLEAU, GREG	Due to the extreme run-on/run-off potential at this Oil and Gas Location, COGCC concludes that E&P waste managed onsite must be appropriately handled. Therefore the COA requiring a closed loop system and isolation of cuttings from ground surface, precipitation and snowmelt will remain in effect. This COA is not related to the Location's proximity to Project Rullison, but is based on the environmental setting at the surface.
☐	OGLA	DERANLEAU, GREG	Due to the extreme run-on/run-off potential at this Oil and Gas Location, COGCC concludes that stormwater BMPs must be implemented during construction of the Location and access road to ensure compliance with COGCC and CDPHE rules. Operator's provided construction layout drawings show that design considerations have been made for the pad, both before and after interim reclamation, but the same detail has not been provided for the access road. Therefore this COA remains in force.

Add | Remove

Thanks,

Greg Deranleau
Oil & Gas Location Assessment Supervisor
Colorado Oil and Gas Conservation Commission
303-894-2100 ext. 5153

From: Mitchell, Heather R. [mailto:Heather.Mitchell@encana.com]
Sent: Wednesday, May 29, 2013 2:45 PM
To: Kubeczko, Dave; 'greg.deranleau@state.co.us'
Subject: FW: PC22 COAs - Document # 400418188

Dave and Greg:

We are preparing to drill this pad. I have not heard back from anyone regarding the removal of these COAs. I did talk with Kevin King and Chris Canfield about their take on the COAs (I believe Greg was going to also communicate with the them to ensure everyone is on the same page). It seems to me that both Chris and Kevin are in agreement that Encana should be using standard BMPs for management of this site and not special Rulison COAs. Can you please confirm that?

Please let me know if you need anything further or have any concerns.

Thanks,

Heather Mitchell
Regulatory Analyst
720.876.3070
303.725.2694

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encana.com

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From: King - DNR, Kevin [mailto:kevin.king@state.co.us]
Sent: Thursday, May 23, 2013 2:34 PM
To: Mitchell, Heather R.
Subject: Re: PC22 COAs

Heather,

Yes, I agree that that COA is confusing/misleading. If you comply with the SAP you will be in compliance with the COA. We have recently simplified this COA to say "OPERATOR SHALL COMPLY WITH ALL PROVISIONS OF THE MOST RECENT COGCC APPROVED REVISION OF THE RULISON SAMPLING AND ANALYSIS PLAN." in and effort to help reduce confusion. Please feel free to replace that COA with this new wording.

thanks,

On Thu, May 23, 2013 at 1:53 PM, Mitchell, Heather R. <Heather.Mitchell@encana.com> wrote:
Kevin:

The following COA is attached to all the PC22 wells, which fell into the Rulison Blast Area, however, it is not the closest well. There are several wells closer that were drilled by Laramie. Our interpretation of this the RSAP is that if there is a closer well within the sector, than the we do not need to do sampling or monitoring. This COAs is a bit confusing and I wanted to make sure that if we abide by the RSAP, then we are complying with the COA.

OPERATOR SHALL COMPLY WITH ALL PROVISIONS OF THE MOST RECENT COGCC-APPROVED REVISION OF THE RULISON SAMPLING AND ANALYSIS PLAN. IN ADDITION TO THE PRODUCED-WATER SAMPLING AND ANALYSIS OUTLINED IN SECTION 5.8 OF THE PLAN, THE OPERATOR SHALL ALSO OBTAIN AND ANALYZE PRODUCED-WATER SAMPLES ON WELLS DESCRIBED IN THE PLAN FOR CONSTITUENTS LISTED IN THE PLAN USING THE SPECIFIC METHOD WHERE APPLICABLE.

Please let me know your thoughts on this one.

Thanks,

Heather Mitchell
Regulatory Analyst
720.876.3070
303.725.2694

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http://www.encana.com

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Kevin J. King, P.E.

NW Area Engineer

Colorado Oil & Gas Conservation Commission

1120 Lincoln Street, Suite 801

Denver, CO 80203

Please note, my email address has now been reverted back to the original: kevin.king@state.co.us Sorry, for any confusion this may have caused.

303.894.2100 ext. 5173 office

303.894.2109 fax

970.379.1035 cell

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