

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Monday, September 23, 2013 3:26 PM
To: dave.kubeczko@state.co.us
Subject: FW: EnCana Oil & Gas (USA) Inc., E (Eureka Unit) C19 397 Pad, NENW Sec 19 T3S R97W, Rio Blanco County, Form 2A #400463409 Review

Categories: Operator Correspondence

Scan No 2106773 CORRESPONDENCE 2A#400463409

From: Lind, Jennifer R. [mailto:Jennifer.Lind@encana.com]
Sent: Friday, September 20, 2013 10:19 AM
To: 'Dave Kubeczko - DNR'
Subject: RE: EnCana Oil & Gas (USA) Inc., E (Eureka Unit) C19 397 Pad, NENW Sec 19 T3S R97W, Rio Blanco County, Form 2A #400463409 Review

Dave, these COAs are acceptable.

Have a nice weekend!

Thank you,
Jennifer

-----Original Message-----

From: Dave Kubeczko - DNR [dave.kubeczko@state.co.us]
Sent: Wednesday, September 18, 2013 03:02 PM Mountain Standard Time
To: Lind, Jennifer R.
Subject: EnCana Oil & Gas (USA) Inc., E (Eureka Unit) C19 397 Pad, NENW Sec 19 T3S R97W, Rio Blanco County, Form 2A #400463409 Review

Jennifer,

I have been reviewing the E (Eureka Unit) C19 397 Pad **Form 2A** (#400463409). COGCC would like to attach the following conditions of approval (COAs) based on the information and data EnCana Oil & Gas (USA) Inc. (EnCana) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following conditions of approval (COAs) will apply:

COA 91 - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

COA 9 - As required for Groundwater Baseline Sampling; Operator shall comply with Rule **609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING:**

c. Inability to locate an Available Water Source. Prior to spudding, an operator may request an exception from the requirements of this Rule 609 by filing a Form 4 Sundry Notice for the Director's review and approval if:

(1) No Available Water Sources are located within one-half (1/2) mile of a proposed Oil and Gas Well, Multi-Well Site, or Dedicated Injection Well;

Construction: 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 or buried permanent pipelines.

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Construction Layout Drawings and Location Drawing attachments); 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 44 - The access road will be constructed and maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COA 76 - 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.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 38 - The moisture content of any cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

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, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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.

Drilling/Completions: The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface or buried pipelines (poly or steel) are used during operations at the well pad location or nearby well pads:

COA 45 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email dave.kubeczko@state.co.us) and the COGCC Field Inspection Supervisor for Northwest Colorado (Shaun Kellerby; email shaun.kellerby@state.co.us) 48 hours prior to testing surface poly/sterel or buried poly/steel pipelines.

COA 48 - Operator must implement best management practices to contain any unintentional release of fluids along all portions of any surface pipeline route, if constructed, where temporary pumps and other necessary equipment are located.

COA 49 - Operator must routinely inspect the entire length of any surface pipeline, if constructed) to ensure integrity. Operator shall conduct daily inspections of surface poly pipeline routes for leaks during active transfer of fluids. Inspections shall be conducted by viewing the length of the pipeline; operator will endeavor to minimize surface disturbance during pipeline monitoring. The operator shall maintain records of inspections, findings and repairs, if necessary, for the life of the pipelines.

COA 55 - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing any surface or buried pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

COGCC would appreciate your concurrence with attaching the COGCC COAs to the Form 2A permit prior to passing the OGLA review. In addition, could EnCana provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location when you receive them. 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
Western Colorado**

Colorado Oil & Gas Conservation Commission
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