

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Monday, September 23, 2013 9:53 PM
To: dave.kubeczko@state.co.us
Subject: FW: EnCana Oil & Gas (USA) Inc., Pitman (O22NW) Pad, SWSE Sec 22 T6S R93W, Garfield County, Form 2A #400470065 Review

Categories: Operator Correspondence

Scan No 2106778 CORRESPONDENCE 2A#400459709

From: Mitchell, Heather R. [mailto:Heather.Mitchell@encana.com]
Sent: Thursday, September 19, 2013 4:20 PM
To: Kubeczko, Dave
Cc: Bidgood, Alexis
Subject: FW: EnCana Oil & Gas (USA) Inc., Pitman (O22NW) Pad, SWSE Sec 22 T6S R93W, Garfield County, Form 2A #400470065 Review

Encana agrees to the below COAs.

Heather Mitchell
Regulatory Analyst
720.876.3070
303.725.2694

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

Please note some Encana offices are closed the first and third Friday of each month.

FYI

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Wednesday, September 18, 2013 7:41 AM
To: Mitchell, Heather R.
Subject: EnCana Oil & Gas (USA) Inc., Pitman (O22NW) Pad, SWSE Sec 22 T6S R93W, Garfield County, Form 2A #400470065 Review

Heather,

I have been reviewing the Pitman (O22NW) Pad **Form 2A** (#400470065). 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:**

In addition, this location has been designated a “sensitive area” due to proximity (716’ to the east) to a nearby domestic water well; depth to groundwater has been revised to 120’ below ground surface based on interpolation of surrounding water well data.

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 attachment); 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 54 - Operator must ensure appropriate secondary containment for volume of fluids that may be released before pump shut down from the surface pipeline at all stream, intermittent stream, ditch, and drainage crossings. Catchment basins, if needed, should be sized to contain the volume between pump stations or between the nearest pump station and the frac pad being used for this well pad location. Pump stations along

the surface poly or steel pipeline route will be continuously monitored when operating in order to swiftly respond to such a failure.

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. 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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