



West Fork A-15 596 Pit (A15 Pit)

Encana Oil & Gas (USA) Inc.

Form 28 Supplemental Information

October 2014

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1. 908.a: Applicability

1.1.Current COGCC Status

The intent of this submittal is to prove compliance with the current standards set by the Colorado Oil & Gas Conservation Commission (COGCC) for a Form 28 permit for the WF A15 596 pit (A15 pit), see attached Form 28 in Appendix 1. The A15 pit is an existing earthen pit built in 2012 that is currently operating under a Form 15, Permit Number of 428147, facility ID A-15 596 (see Appendix 2).

1.2.Facility Objectives

The A15 pit is a non-commercial, centralized E&P waste management facility used to store E&P waste for the purposes of recycling, reuse, and disposal of Encana Oil & Gas (USA) Inc. (Encana) operations in the Piceance Basin area of Garfield County, Colorado. The objectives of A15 pit are to:

- Reuse and recycle produced and flowback water within the Piceance Basin.
- Minimize environmental impact by:
 - Maximizing the use of recycled water;
 - Following Best Management Practices (BMPs);
 - Minimizing environmental liability by operating the facility in accordance with all permits; and
 - Minimizing the cost of managing water within the Piceance Basin.

This facility is authorized to receive the following influent:

- Flowback and produced water from Encana operated wells in the South and North Piceance Sub-Business Units (SBUs).

Flowback and produced water from other oil and gas operators may be received by this facility on a case-by-case basis, through a Colorado Oil & Gas Conservation Commission (COGCC) Rule 502.b variance request and approval with a water sharing agreement in place. No third-party influent will be accepted if doing so violates the A15 pit's status as a non-commercial facility.

2. 908.b.(1), (2) & (3): Contact Information & Legal Site Description

Encana owns the property on which the A15 pit is located as shown in the survey plat provided in Appendix 3. The contact information for the operator, who is also the surface owner, is as follows:

Encana Oil & Gas (USA) Inc.
370 17th St, Suite 1700
Denver, CO 80202

The legal description of the site is the NE ¼ of the NE ¼ of Section 15, Township 5 South, Range 96 West of the 6th Principal Meridian; coordinates 39.621792 North latitude and -108.148903 West longitude, Garfield County, Colorado.

3. 908.b.(4): Topography, Geology and Hydrology

3.1.General Site Description

The facility site is adjacent to the West Fork of Parachute Creek, approximately 14.8 miles northwest of the Town of Parachute, Colorado. The site is located at the bottom of deep valley with mesas rising above the site on two sides. The elevation at the site is approximately 6,400 to 6,440 feet above sea level. A vicinity topographic map and a close-up topographic map are provided in Appendix 4: Figures 1 and 2 respectively. The location of the A15 pit is relatively remote.

3.2.Adjacent Land Use

Land adjacent to the A15 pit is owned by the Bureau of Land Management and Exxon Mobil Corporation and both fall within a 2 mile radius of the site, see Appendix 5. Their land usage includes: natural gas exploration and production, historic oil shale mining, livestock grazing (on ridges) and wildlife habitat. The surrounding land uses are not adversely impacted by operation of the facility due to the remote location and some of the existing surrounding uses also being used for Oil & Gas purposes.

3.3.Topography

The A15 pit site is located in the bottom of a draw at an approximate elevation of 6,400 to 6,440 feet above sea level, see Appendix 4. The location is within a deep canyon with steep slopes on two sides with drainage around the facility and the surrounding area flowing mostly South and a little East. Davis Point Ridge is located east of the site while the Roan Plateau is north of this facility.

3.4.Geology

A detailed review and report of the geology and hydrology of the A15 pit location is included in Appendix 6. A summary of the geology from this report is as follows. The bedrock geology at this location, along with the walls of the canyon, is the Parachute Creek Member of the Green River Formation, which consists in part of oil shale, marlstone and siltstone. The Mahogany ledge of the Parachute Creek Member outcrops in the cliffs above the site. The drill logs from 4 monitoring wells drilled on the site show that at the surface there are colluvium deposits consisting of shale and sandstone fragments, underlain in some places by sandstone and small lenses of clay, shale or sandstone. The wells were drilled down to 85 feet and no groundwater was encountered. All samples encountered were dry, with no staining or odor. Published USGS geologic information confirms that there is talus and slope wash at the base of the steep cliffs in this area. The Lower Part of the Tertiary Green River Formation, consisting of shale, sandstone, marlstone and limestone has been identified as the bedrock down canyon from the A15.

3.5.Hydrology

The site is located by the West Fork of Parachute Creek, approximately 4 miles upstream of the confluence of this creek with the Middle Fork of Parachute Creek. According to the approved Form 15 (March, 2012) for the A15 pit, groundwater was discovered at 30 feet below ground surface (BGS). Updated site-specific soil investigations indicate that there is alluvial groundwater may even be below 85 feet of the ground surface, based on monitoring wells drilled at the site in April, 2013. The two

major groundwater aquifers in the Piceance Basin are within the formations found in the cliffs throughout the canyon and on top of the ridgelines, closer to the center of the basin. Please refer to Appendix 6 for more detailed explanations of the local hydrology. The surface water features are further discussed in Section 11.1.

3.6. Average Annual Precipitation and Evaporation Rates

The average annual precipitation in the area is approximately 11.61 inches based on the Western Regional Climate Center records for Rifle, Colorado (Station #057031) (see Appendix 7). The average annual evaporation in the area is approximately 57.45 inches based on data from the Western Regional Climate Center evaporation pan data for Montrose, CO (see Appendix 7).

4. 908.b.(5).A: Site Plan

An overall site plan for the existing facility is provided in Appendix 8.

5. 908.b.(5).B: Survey Drawings

A site survey describing established monuments and relevant section corners is provided in Appendix 3. Engineering drawings with the A15 pit design information and relevant survey information is included in Appendix 8.

6. 908.b.(5).C: Access Control Measures

The facility is accessed via County Road 215 from the town of Parachute. The A15 pit is located within the Encana owned North Parachute Ranch area and can only be accessed through a guard gate with card reader. There is no public access into the Ranch and therefore no public access to the A15 pit. A map is included in Appendix 9.

Wildlife and domestic animal access to the A15 pit is controlled through the following measures:

- Mesh or other coverings on all equipment openings including vents, etc, where applicable.
- Wildlife netting around and covering the entire pit
- Audio deterrents to keep birds away
- No pets are allowed on-site.

The activities at the site comply with Encana's Wildlife Protection Policies, as outlined in the Migratory Bird Treaty Act and Other Wildlife Protection Requirements document. Inspection and maintenance of these control measures is conducted bi-monthly.

7. 908.b.(5).D: Fire Access

A fire access road with a minimum width of ten (10) feet has been provided adjacent to the pit area, as shown in Appendix 8 (Drawing NP-A15-P-100).

8. 908.b.(5).E: Surface Water Design

The engineering drawings for the A15 location are located in Appendix 8. These drawings detail the diversion structures, run-on controls and run-off controls for this location. Additional stormwater information is provided in the North Parachute Ranch area Stormwater Management Plan (Appendix 10).

9. 908.b.(6): Waste Profile

The only process stream entering and exiting the A15 pit is produced/ flowback water. Based on historic operations in this area, the average throughput is roughly 3,000 barrels per month. Typical characteristics for produced/ flowback water in the North Parachute Ranch area are provided in Table 1.

Table 1: Typical Produced/Flowback Water Quality

Component	Typical Range (mg/l)	Average Value (mg/l)
TPH-GRO (C6-C10)	1-580	150
TPH (C10-C28)	10-440	170
Methanol	2-112	75
Total Suspended Solids (TSS)	17-670	135
BTEX	5-100	35

10. 908.b.(7).A: Facility Design and Engineering – Geology

Facility design and engineering data, including plans and elevations, the design basis and calculations, are located in Appendix 8.

10.1. Geologic Investigation

A boring log was completed on the monitoring wells drilled in 2013. The drill logs for the 4 on-site monitoring wells are included as Appendix 11. Both colluvium and sandstone are seen in the drill logs, depending on which borehole description is reviewed. No groundwater was encountered during the drilling of the monitoring wells. In some wells, the colluvium was encountered at a depth of 85 feet while in another well sandstone was encountered at a depth of 20 feet.

10.2. Structural Geology

See response to Rule 908.b.(4) and Appendix 6.

10.3. Geologic Hazards

The following section describes the geologic hazards identified for the A15 Pit site. Steep slopes and rockfall are potential geologic hazards in this area. There were no landslide deposits mapped on the Circle Dot Gulch Preliminary Geologic Map (Hail, 1982). Alluvial fan deposits are present at the mouths of steep side canyons which indicate the potential for flash floods in these areas are a hazard. No faults have been identified or mapped in the immediate area of the A15 pit site. There are some small grabens located to the north and northwest. During the period from 1962 and 2007 one earthquake a

magnitude of 5 to 5.5 on the Richter scale is shown to the south of the town of Parachute in Garfield County with is shown on the 2007 Colorado Earthquake Hazards Map prepared by the Colorado Geologic Survey (Morgan, 2007). A geologic hazards investigation was completed in 2014 which concluded that there is the potential for flash floods in the canyon areas. This report is included as Appendix 6.

11. 908.b.(7).B: Facility Design and Engineering – Hydrology

11.1. Surface water features

Local surface water features within two (2) miles are shown in Appendix 6, Figure SW-1. Approximately (4) miles downstream of the A15 pit the West Fork of Parachute Creek converges with the Middle Fork and the East Fork to form Parachute Creek. Parachute Creek flows southward and ultimately discharges into the Colorado River.

11.2. Shallow ground water

There is no shallow groundwater at the site (see Section 0).

11.3. Major aquifers

The two major groundwater aquifers in the Piceance Basin are found within the cliff formations of the canyon and on top of the ridgelines, closer to the center of the basin. The aquifer underlying the proposed site is the Mesaverde Aquifer (Groundwater Atlas of Colorado – Colorado Geological Survey – 2005) which is not typically the source for water supply wells in this area. Very few details are provided on the hydrologic characteristics of the Mesaverde aquifer, but the Williams Fork Formation (the upper most section of the Mesaverde Group) consists of lenticular, discontinuous sand bodies, as seen in out crop to the east and west of the basin. The Mesaverde Formation is also the source of most of the natural gas produced in the Piceance Basin.

11.4. Local water wells

There are no permitted water supply wells in the immediate vicinity of the site.

11.5. Local Floodplains

The site is not located within a designated 100-year floodplain. The local floodplain along the Colorado River and in the vicinity of the town of Parachute is shown in Appendix 6, Figure FP-1. The site is, however, at risk from flash-floods that could occur if significant rainfall or rapid snowmelt in the upland areas to the northwest and east of the site result in heavy runoff to the West Fork of Parachute Creek.

11.6. Shallow ground water quality

There is no shallow groundwater at the site (see Section 0).

11.7. Impact potential

Potential impacts include increased runoff and degraded stormwater water quality due to development. Stormwater runoff quality has been addressed through the construction of run-on diversion ditches, a

stabilized pad entrance, gravel surfacing, perimeter containment berms, pad drainage diversion ditches, a stormwater detention pond, rip rap outfall, cut and fill slope surface roughening and vegetation, among others specified within Encana's Stormwater Management Plan (SWMP), found in Appendix 10.

The current Spill Prevention, Control and Countermeasure (SPCC) Plan (Appendix 12) demonstrates that the A15 pit design includes two (2) feet of freeboard. The SPCC plan also discusses some of the above listed controls and other measures taken to mitigate the potential impacts from a potential spill event. The SPCC Plan is amended annually per EPA rules. Potential impacts to underground formations are mitigated through the use of pond liners.

12. 908.b.(7).C: Facility Design and Engineering – Engineering Data

The basic process description for this pit includes a simple offload pad for trucks to unload collected water through bag filters prior to gravity draining into the pit. An additional connection to the main pipeline in the area to fill the pit from the Middle Fork water treatment facility or local flowback operations as well as the ability to pump water from the pit to either of these locations. This facility stores and transfers produced / flowback water from natural gas exploration and production operations. Drawings of the A15 Site are located in Appendix 8.

12.1. Process Description

Produced water that is stored in the A15 is generally treated at Encana's Middle Fork Water Facility prior to entering the facility in one of the following ways:

- One (1) pipeline
- Truck off-loading on-site

Water used to support hydraulic fracturing is pumped out of the A15 Pit to Encana's Middle Fork Water Facility.

Water which cannot be reused within Encana's water system due to the near-term water balance is pumped to Encana's Middle Fork Water Facility and then disposed of via underground injection using the pipeline network that connects to that facility.

12.2. Permanent Structures and Equipment

An overall site plan for the facility is shown in Appendix 8. There are no buildings or tanks associated with the A15 pit.

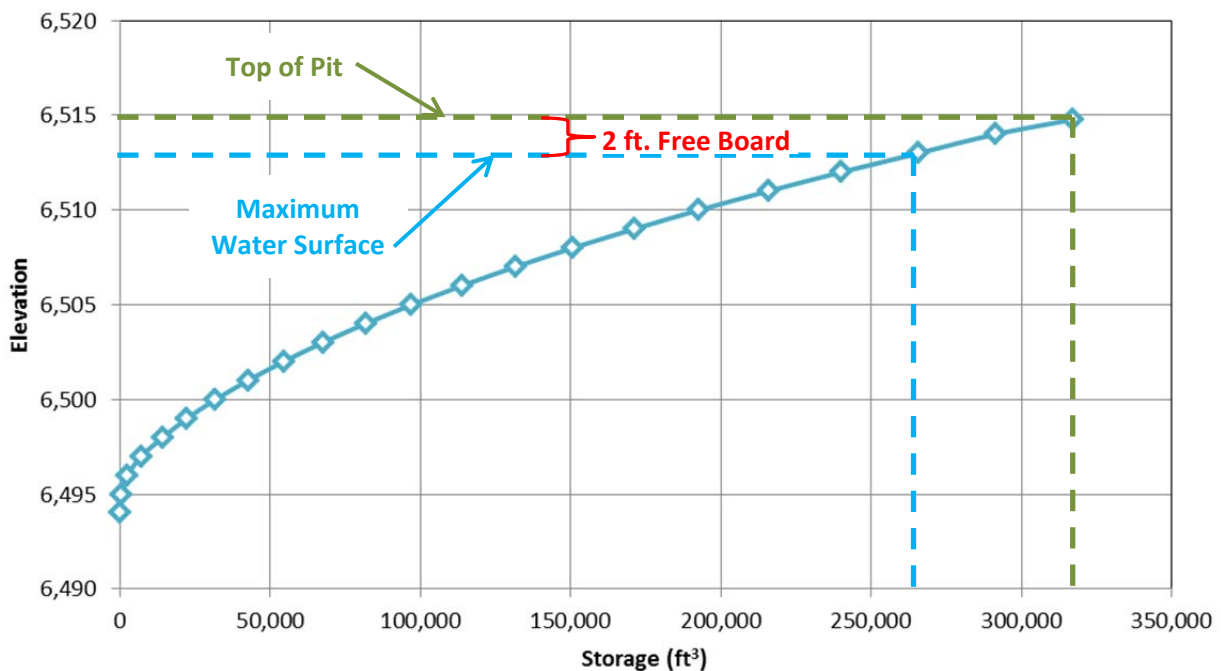
12.3. Storage Pit

Storage volume details for the A15 pit are shown below. Details of the pond liners, dimensions and leak detection system are included in the approved Form 15 for the A15 pit (Appendix 8.)

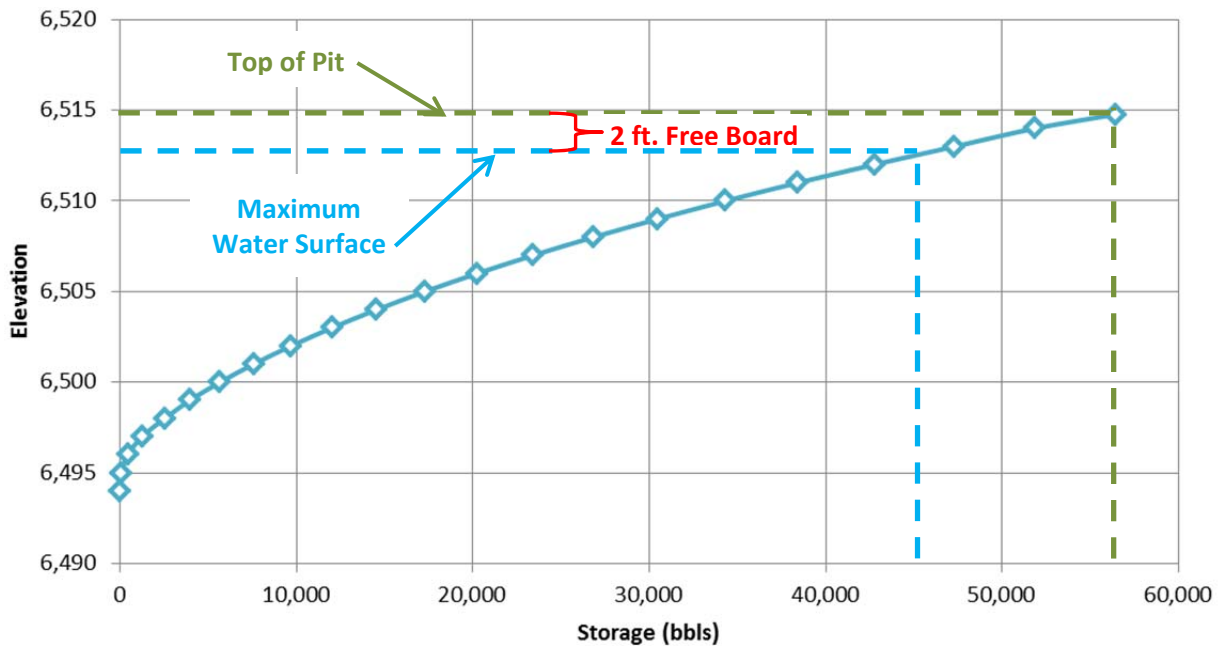
Table 2: A15 Pit Stage-Storage Data

Elevation (ft)	Area (ft ²)	Depth (ft)	Incremental Vol. (bbls)	Accumulated Vol. (bbls)	Accumulated Vol. (ft ³)
6,494		0	0	0	0
6,495	1,152	1	67	67	374
6,496	3,186	1	386	453	2,543
6,497	5,722	1	793	1,246	6,997
6,498	7,936	1	1,289	2,535	14,236
6,499	9,037	1	1,421	3,956	22,213
6,500	10,156	1	1,709	5,665	31,810
6,501	11,293	1	1,910	7,575	42,534
6,502	12,448	1	2,114	9,689	54,405
6,503	13,620	1	2,321	12,011	67,439
6,504	14,810	1	2,532	14,542	81,654
6,505	16,018	1	2,745	17,287	97,068
6,506	17,244	1	2,962	20,249	113,699
6,507	18,487	1	3,182	23,431	131,564
6,508	19,748	1	3,405	26,836	150,682
6,509	21,027	1	3,631	30,467	171,069
6,510	22,324	1	3,860	34,327	192,745
6,511	23,639	1	4,093	38,420	215,726
6,512	24,971	1	4,329	42,748	240,031
6,513	26,322	1	4,568	47,316	265,678
6,514	27,673	1	4,806	51,883	291,324
6,514.8	29,024	0.8	3,885	56,451	316,971

Graph 1: Pit A15 Stage-Storage Curves (ft³)



Graph 2: Pit A15 Stage-Storage Curves (bbls)



12.4. Spill Containment

12.4.1. Secondary Containment Design

The A15 Pit provides below grade storage for produced water. A spill from the A15 Pit is not possible. Secondary containment is provided for the truck loading facility at the A15 Pit site. Details of the secondary containment locations, sizing and design are located in engineering drawings in Appendix 8. This plan is regularly updated to accommodate any changes to the site.

12.4.2. Truck off-load pad

The truck off-load pad consists of a concrete apron sloped into a trench drain. The proposed design has been used successfully at the A15 site as well as numerous other truck off-loading pads throughout Encana's operations. A detail of this design is provided in Appendix 8.

13. 908.b.(8): Operating Plan

A Standard Operating Procedure (SOP) for pumping into and out of Pit A15 is in place, and is located in Appendix 13. Additionally, included within the SOP for Pit A15 is the Fugitive Dust Control Plan for the Piceance Basin.

14. 908.b.(9).A: Water Wells

See Section 11.4.

15. 908.b.(9).B: Monitoring Wells

There are two (2) water well permit numbers located within a one (1) mile radius of this site, as shown on Figure GW-1 in Appendix 6. Each of these permit numbers is associated with multiple monitoring wells. Both well sets are monitoring wells owned by Encana. These wells are approximately located as follows:

- Colorado Division of Water Resources Permit # 044233-MH
SW ¼ SE ¼ Section 10, T5S, R96W (39.624083N; -108.15310232W)
Estimated depth: 30 feet below ground surface (bgs)
- Colorado Division of Water Resources Permit #051369-MH
NE ¼ NE ¼ Section 15 T5S, R96W (39.620463N; -108.148414W)
Estimated depth: 100 feet bgs.

The first set of monitoring wells is located northwest of the A15 site (see Appendix 11). There was no evidence of groundwater when these wells were drilled, with a maximum depth of 85 feet below ground surface (bgs). The second permit location is located to the south of the site. Both wells were drilled to 34 feet bgs (listed), but were reported to be dry when installed.

There are permitted monitoring wells owned by Exxon located to the east further than a mile from the site. These wells are completed in the Uinta and upper Parachute Creek member to total depths ranging from 615 feet to 1,020 feet below top of casing. The static water levels in these wells are listed at 469 feet and 695.10 feet below top of casing. These wells are used to measure groundwater elevations and sampled to assess water quality in conjunction with the reclamation of Exxon's Colony Shale Oil Project mining site on Davis Point.

There are no permitted water supply wells in the vicinity of the site.

16. 908.b.(10): Surface Water Monitoring

There is a quarterly sampling program in place on the West Fork of Parachute Creek, including locations upstream and downstream of the A15 site. The surface water monitoring locations relevant to the A15 pit are shown in Appendix 14, along with water quality data from each relevant monitoring location from the third quarter of 2013 through 2014 (one full year).

17. 908.b.(11): Contingency Plan

17.1. Site Safety / Evacuation Plan

A site specific safety and evacuation plan has been prepared for the facility (see Appendix 15). This plan includes directions to the site, emergency contact information, and designated muster points. This plan is kept on-site at all times.

17.2. Chemicals On-site

There are no chemicals on-site associated with the operations of the A15 pit facility.

17.3. Spill Prevention, Control and Countermeasure Plan

A spill prevention plan is in place for the North Parachute Ranch area in accordance with EPA regulations. The latest version of the plan (updated in February 2013) is included in Appendix 12. The A15 pit is constructed below grade and two (2) feet of freeboard is maintained in it at all times.

17.4. Emergency Response Plan

Encana requires that Emergency Preparedness and Emergency Response Plans (ERP) be in place in the specific regions of the company. These plans are kept current and are supported by training and resources to ensure decisive and effective incident response. Encana's Emergency Response Plan, including notification and activation requirements are included in Appendix 16.

The current Emergency Notification Chart for the Western Operations Region is provided in Appendix 15. The Site Safety and Evacuation Plan is also included in Appendix 15.

Encana's Emergency Response Plan (ERP) facilitates a coordinated response by Encana's personnel to any emergency situation related to seismic/exploration, construction, drilling, completion, workovers, operations, remediation, reclamation and support services. It will describe the procedures which will be implemented, in whole or in part, if an emergency situation occurs during any phase of Encana operations including, but not limited to, the following types of incidents:

- Serious injury or fatality
- Vehicle related incident
- Major property or equipment damage
- Fire or explosion
- Spill, hazardous materials release, or product release
- Security threat or suspicious activity
- Natural occurrence

18. 908.d: Financial Assurance

Financial assurance, as required by Rule 904 and 907.d, is included in Appendix 17 of this submittal.

19. 908.e: Facility Modifications

Any future major modifications to the facility design, operations plan, permit data or permit conditions will be submitted to the COGCC for prior approval under a Form 4 Sundry notice and in accordance with Rule 908.e.

Any minor modifications to the facility design, operations plan, permit data or permit conditions (from entities other than the COGCC) will be included in the annual report submitted to the COGCC per Rule 908.f.

20. 908.f: Annual Permit Review

An annual A15 report will be submitted to the COGCC which will include:

- Volume of water entering and exiting the facility
- Source water well additions
- Injection well additions
- Surface and/or groundwater sampling results
- Any facility modifications, per Rule 908.e.

21. 908.g.(1).A: Preliminary Closure Plan

The A15 pit is expected to operate for twenty (20) years or greater. However, the facility could be closed earlier due to the continuously changing natural gas market conditions.

At closure, the following tasks will be undertaken at the A15 pit:

- Removal of the following items:
 - Industrial waste and chemicals including bottom solids
 - Equipment including pipelines, etc.
 - Drainage controls
 - Other industrial components, as required by COGCC regulations at the time of closure
- Native soil sampling and analysis for Table 910-1 constituents
- Comparison of closure samples with baseline samples to determine if naturally occurring background concentrations have been exceeded.
- Completion of remediation activities required by soil sampling results
- Site restoration to pre-facility conditions, including recontouring and revegetating the site, redistribution of topsoil and reseeded.
- Site monitoring to verify that seventy (70) percent of the preexisting vegetation is achieved.
- Final reclamation in accordance with COGCC regulations at the time of closure.

Additional details regarding the revegetation plan are located in Appendix 18

22. 908.g.(1).B: Preliminary Closure Cost

The Closure and Reclamation Plan for the A15 pit is included in Appendix 18. A cost estimate of \$303,000 is included for closing and reclaiming the A15 pit.

23. 908.g.(2): Final Closure Plan

A detailed Site Investigation and Remediation Workplan (Form 27) will be submitted to the COGCC for approval a minimum of sixty (60) days prior to closure of the A15 site.

24. 908.h: Other Permits and Notifications

The A15 Pit is exempt from CDPHE regulations per CDPHE Air Quality Control Commission Regulation 3, which states that any pit that contains less than 1% by volume of oil is exempt from permitting requirements. Encana pulls samples from the A15 Pit annually to ensure that the pit remains in compliance with Regulation 3.

The following permits and notifications to local governments and other agencies are provided as appendices to this submittal:

- Garfield County
 - Special Use Permit (Resolution 2013-72) is included in Appendix 19.