

STATE OF
COLORADO

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Morgan Hills BMPs

2 messages

Treitz - DNR, Rebecca <rebecca.treitz@state.co.us>

Fri, May 27, 2016 at 10:56 AM

To: "Sachen, Toby R." <Toby.Sachen@encana.com>

Toby,

COGCC is reviewing the letter from COGCC to the Town of Erie and the letter from Encana to OCGCC regarding the Morgan Hills BMPs.

1. In the letter between Encana and COGCC, number 19 references BMPs and COAs and there are only COAs being added to the 2A. COGCC would like to have the COA be from the original letter between COGCC and Erie. Please let us know if you concur with the change.

Revision of best management practices

a. From COGCC to Erie for a COA:

"Any changes to the COAs or BMPs shall be submitted for prior COGCC approval via a Form 4 Sundry Notice. Any changes to BMPs which implicate the Operator's MOU with Erie shall be submitted with concurrence from the Town of Erie for the change."

b. From Encana to COGCC:

"An enumeration of the BMPs and COAs that reflect the Agreement will replace the phrase "BMPs which implicate the Operator's MOU with Erie" in the last sentence of the proposed COA so that the sentence reads as follows: "Any changes to the BMPS number _ and COAs number _ shall be submitted with concurrence from the Town of Erie for the change."

As all of the added from the letter between COGCC and Erie and between Encana and COGCC are COAs and not BMPs.

2. In the letter from Encana to Erie, the last was a Generic BMP Added to the COGCC Permits, which contradicts the Agreement and the Amendment for putting a copy of the Agreement, Appendix A, or the Amendment to the Agreement, between Erie and Encana as an attachment to the Form 2A or the Form 2s. COGCCs understanding from the Agreement and Amendment are the full Agreement including Appendix A and the Amendment are to be attached to the Form 2A. Please inform COGCC of Encana's intent for Agreement, Appendix A, and Amendment as part of the 2A.

a. From Encana to COGCC:

"The proposed language referring to the Agreement and the BMPs will be omitted and no reference document will be attached to the Form 2A authorization. Instead, Encana will submit a copy of the Agreement to the Commission, and the Commission will retain the Agreement in the location file for reference purposes. This change is intended to avoid creating any confusion regarding those B<Ps in the Agreement that are not incorporated into the Form 2A authorization as COAs. "

b. From the Amendment:

"Encana shall also include a copy of the Agreement with each Form 2A and Form 2 submitted to the COGCC for such well pad sites."

Please let myself or John Noto know if you have questions on this.

Thank you,

Rebecca

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Sachen, Toby R. <Toby.Sachen@encana.com>
To: "Treitz - DNR, Rebecca" <rebecca.treitz@state.co.us>

Thu, Jun 2, 2016 at 10:00 AM

Hi Rebecca,

We can agree to the substitution in #1 and, regarding #2, we will attach the Agreement to the form 2As. We prefer not to attach to the 2s as it is redundant. We will do this if the COGCC wants us to however,

Toby

Toby Sachen

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Encana Services Company Ltd. provides
operational, corporate, administrative and
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From: Treitz - DNR, Rebecca [mailto:rebecca.treitz@state.co.us]
Sent: Friday, May 27, 2016 10:56 AM
To: Sachen, Toby R. <Toby.Sachen@encana.com>

Subject: Morgan Hills BMPs

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