

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, July 14, 2010 10:37 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), Keinath Federal 17-11H (C16OU) Pad, NENW Sec 16 T8S R96W, Mesa County, Form 2A (#400074448) Review

Scan No 2033262 CORRESPONDENCE 2A#400074448

From: Spector, DeAnne M. [mailto:DeAnne.Spector@encana.com]
Sent: Thursday, July 08, 2010 8:19 AM
To: Kubeczko, Dave
Subject: RE: EnCana Oil & Gas (USA), Keinath Federal 17-11H (C16OU) Pad, NENW Sec 16 T8S R96W, Mesa County, Form 2A (#400074448) Review

Dave,

My responses are in red below. Is there any chance the COGCC would be willing to put together training at some point on these water issues? I seem to always be given incorrect data.

Thank you for your help

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, July 08, 2010 7:44 AM
To: Spector, DeAnne M.
Subject: EnCana Oil & Gas (USA), Keinath Federal 17-11H (C16OU) Pad, NENW Sec 16 T8S R96W, Mesa County, Form 2A (#400074448) Review

DeAnne,

I have been reviewing the Keinath Federal 17-11H (C16OU) Pad **Form 2A** (#400074448). COGCC requests the following clarifications regarding the data EnCana has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

- Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1322 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages), as well as, perennial streams. COGCC's review (USGS topographic map and 2009 aerial photograph) indicates there is an intermittent stream/drainage located approximately 262 feet to the east. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. **I agree**
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids. **I agree**
- Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 1000 feet bgs for a well located 6426 feet from the proposed well pad. COGCC's review indicates there is a water well (Permit No. 215181-Jandak, domestic well) located 7498 feet to the east-northeast, with a total depth of

180 feet bgs and a depth to groundwater of 125 feet bgs. I believe this well is indicative of groundwater conditions in this area. I can make the change if you send me an email with this request. I agree

3. **General:** The following conditions of approval (COAs) will apply:

COA 38 - The moisture content of any drill 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, the drill cuttings must also meet the applicable standards of table 910-1. I agree

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs to be addressed prior to permit approval. 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

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