

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, August 31, 2010 8:33 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), North Parachute EF G29 595 Pad, SWNE Sec 29 T5S R95W, Garfield County, Form 2A (#400080090) Review

Scan No 2033335      CORRESPONDENCE      2#400080090

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**From:** Carter, Julia M [mailto:Julia.Carter@encana.com]  
**Sent:** Thursday, August 19, 2010 9:41 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: EnCana Oil & Gas (USA), North Parachute EF G29 595 Pad, SWNE Sec 29 T5S R95W, Garfield County, Form 2A (#400080090) Review

Dave,

Thank you for the e-mail. Encana accepts the COAs (items 1, 2 and 3) listed below for the N. Parachute EF G29 595 pad.

Thank you,

Julia Carter  
Regulatory Analyst  
Encana Oil & Gas (USA) Inc.  
720.876.5240 (office) | 303.819.7349 (cell)  
720.876.6240 (fax)

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, August 16, 2010 3:37 PM  
**To:** Carter, Julia M  
**Subject:** EnCana Oil & Gas (USA), North Parachute EF G29 595 Pad, SWNE Sec 29 T5S R95W, Garfield County, Form 2A (#400080090) Review

Julia,

I have been reviewing the North Parachute EF G29 595 Pad **Form 2A** (#400080090). 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) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 100 feet. 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 (East Fork Parachute Creek to the north); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; 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., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.

2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 2943 feet from the proposed well pad. COGCC guidelines require designating all locations with shallow groundwater a **sensitive area**. The following conditions of approval (COA) will apply:

**COA 1** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

**COA 8** - Location is in a sensitive area because of shallow groundwater; therefore any pits containing fluids (if constructed) must be lined.

3. **General:** Due to the potentially permeable and fractured nature of the surface materials in the area, the following conditions of approval (COAs) will apply:

**COA 6** - All pits containing fluids (if constructed; reserve pit, production pit, frac pit) must be lined.

**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.

**COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs (items 1, 2, and 3) 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**

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