

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, October 26, 2010 1:43 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Resend of EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400097909) Review

Scan No 2033483      CORRESPONDENCE      2A#400097909

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**From:** Carter, Julia M [mailto:Julia.Carter@encana.com]  
**Sent:** Tuesday, October 26, 2010 11:43 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Resend of EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400097909) Review

Hi Dave,

I have a question in regards to item #5, COA 25. Is it possible to obtain a sample secondary and tertiary containment plan for us to follow since we will be flowing back into frac tanks?

In regards to #4, we plan for the pipelines to follow the access road.

Encana accepts the remaining COA's listed out in items # 2, 3, and 5.

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, October 25, 2010 11:18 AM  
**To:** Carter, Julia M  
**Subject:** Resend of EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400097909) Review

Julia,

I am resending this email for the North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400097909) Review. The Oil and gas Location Assessment (OGLA) review for this permit can be passed on 10-28-10 since CDOW passed it on 10-07-10. Please call me at (970) 309-2514 if you have any questions.  
Thanks.

Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, October 11, 2010 2:23 PM  
**To:** Carter, Julia M

**Subject:** EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400097909) Review

Julia,

I have been reviewing the North Parachute EF P27 595 Pad **Form 2A** (#400097909). 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. **Soils (Section 12):** Form 2A indicates that the primary soil type is Map #62 – Rock Outcrop – Torriorthents complex, very steep. COGCC’s review indicates that the well pad extends onto a second soil type; Map #48 – Northwater loam, 15 to 65 percent slopes (COGCC has attached this report). This information is very helpful to our reclamation inspectors during the interim reclamation period.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 80 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**; therefore, the following conditions of approval (COAs) will apply:
  - COA 4** - Location is in a sensitive area because of its 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.
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 3512 feet from the proposed well pad. Based on the depth to groundwater and surface geology, this is considered a **sensitive area**. The following condition of approval (COA) will apply:
  - COA 7** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or a closed loop system (which EnCana has already indicated on the Form 2A) must be implemented.
4. **Rule 303.d.(3).C.:** The Location Drawing (Sheet 7a of 10) or the Construction Layout Drawings (Sheet 3 of 10) should show any improvements, particularly any proposed locations of pipelines (gas and water); or if the pipelines will follow the access road, then a statement to that effect is sufficient.
5. **General:** Since the location falls within 300 feet of East Fork Parachute Creek, the following conditions of approval (COAs) will also apply:
  - COA 9** - If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
  - COA 23** - 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., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad and frac pad locations will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.
  - COA 25** - Flowback to tanks only. Flowback and stimulation fluids shall be contained within tanks that are placed on the frac pad in an area with additional downgradient perimeter berming. Operator must submit a secondary and tertiary containment plan via sundry notice Form 4 for the tanks to Dave Kubeczko. Operator must obtain approval of the plan prior to fracing flowback operations.
  - 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 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.

**COA 44** - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

**COA 46** - The location is in an area of high runoff/run-on potential from the proposed pad area; therefore the pad expansion shall be constructed as quickly as possible and appropriate BMPs need to be in place both during and after well pad expansion construction, as well as during all drilling and well completion operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff. Slopes with potential for runoff should be stabilized immediately following pad construction.

**COA 73** - Operator will conduct regular inspections of equipment for leaks and equipment problems with appropriate documentation retained in the operator's office. All equipment deficiencies shall be corrected. Monitoring should end approximately 30 days after well completion and/or after production has been stabilized; however, timely inspections should continue during the production phase.

**COA 74** - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

COGCC would appreciate your concurrence with attaching these COAs (items 2, 3, and 5) to the Form 2A permit prior to passing the OGLA review. The other issue (item 4) 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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