

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 12, 2011 12:07 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400145376) Review (previously reviewed and approved Form 2A #400097909)

**Categories:** Orange Category

Scan No 2033686      CORRESPONDENCE      2A#400145376

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 05, 2011 6:54 PM  
**To:** Mitchell, Heather R.  
**Subject:** EnCana Oil & Gas (USA), North Parachute EF P27 595 Pad, SESE Sec 27 T5S R95W, Garfield County, Form 2A (#400145376) Review (previously reviewed and approved Form 2A #400097909)

Heather,

I have been reviewing the North Parachute EF P27 595 Pad **Form 2A** (#400145376) (previously submitted 2A#400097909, approved on 10/5/2010). COGCC will place the same COAs on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources:** The following conditions of approval (COAs) will apply:
  - COA 4** - Location is in a sensitive area because of its proximity to surface water; therefore, 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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - 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.
2. **General:** Since the location falls within 300 feet of East Fork Parachute Creek, the following conditions of approval (COAs) will also apply:
  - 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 58** - Berms or other containment devices shall be constructed in compliance with Rule 604.a.(4) around crude oil, condensate, and produced water storage tanks.
  - 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.

Based on the additional information provided in the Form 2A by EnCana, COGCC will attach these COAs to the Form 2A permit. EnCana does not need to respond, unless EnCana has questions or concerns with details in this email. If you have any questions regarding this email, 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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