

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, August 05, 2011 9:26 AM
To: Kubeczko, Dave
Subject: FW: EnCana Oil & Gas (USA), CR M09 798 Pad, SWSW Sec 9 T7S R98W, Garfield County, Form 2A (#400185249) Review

Categories: Orange - Operator Correspondence

Scan No 2033949 CORRESPONDENCE 2A#400185249

No Reply from Operator; Same COAs placed on other EnCana Pads in this area; all of which have been concurred with.

From: Kubeczko, Dave
Sent: Monday, August 01, 2011 12:56 PM
To: Carter, Julia M
Subject: EnCana Oil & Gas (USA), CR M09 798 Pad, SWSW Sec 9 T7S R98W, Garfield County, Form 2A (#400185249) Review

Julia,

I have been reviewing the CR M09 798 Pad **Form 2A** (#400185249). COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), a reference has been indicated on a topographic map; therefore; the four (each of the cardinal directions) color photographs attached should indicate the location name, date taken, and direction.
2. **General:** The following conditions of approval (COAs) will apply:
 - 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 location 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 or buried pipelines.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.
 - 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, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

COGCC would appreciate your concurrence with attaching these COAs (item 2) to the Form 2A permit prior to passing the OGLA review. The other issue (item 1) also needs to be addressed prior to permit approval. **In addition, could**

EnCana provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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