



DEPARTMENT OF NATURAL RESOURCES  
*John W. Hickenlooper, Governor*  
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July 11, 2012

Mr. Russell Knight  
Principal Hydrogeologist  
Rule Engineering, LLC  
1055 Kipling Street  
Lakewood, CO 80215

Re: Review of Revised Form 28 Centralized E&P Waste Management Facility Permit Application  
Facility ID #426582  
NPR Solidification Facility  
SENW Section 29, T5S, R95W, 6<sup>th</sup> PM, Garfield County, Colorado

Dear Mr. Knight:

The Colorado Oil and Gas Conservation Commission (COGCC) has completed the review of Encana Oil and Gas (USA), Inc. (Encana) May 24, 2012, revised submittal of the above referenced permit application, for COGCC Facility ID #426582. On future submittals as it relates to this facility, please reference this Facility ID.

- Please provide a copy of the final approved permit from the local government entity.
- Please provide Figure 1 “Process Flow Diagram” as referenced in Attachment D, Encana NSF Waste Characterization, dated March 29, 2012.
- Polycyclic Aromatic Hydrocarbons (PAHs) have been identified in the waste streams:
  - North Frac Tank Bottoms and Produced Tank Battery, NPR-SLO-070511;
  - Pit Bottoms, NPR-LO-PB-071311; and
  - Evaporation and Treatment Pond Solids, BF-PSS-072811.

The South Frac Tank Bottoms (HM-SLO-070511) had a qualifier that the sample was “Diluted due to matrix interferences that impaired the ability to make an accurate analytical determination. The detection limit is elevated in order to reflect the necessary dilution.”

The closure cost estimate should include analytical constituents that have been characterized in the waste profile of the waste streams and those listed in the 910-1 Table. Please revise the closure estimate to reflect the additional analytical constituents.

- What is the time frame for abandonment of the three existing monitoring wells? The cost for abandonment of the monitoring wells should be captured in the closure cost estimate.

Should you have any questions, please contact me at 303-894-2100 extension 5138.

Sincerely,

Alex Fischer, P.G.  
Environmental Supervisor-Western Colorado

Cc: Brett Middleton, Environmental Field Coordinator, Encana Oil and Gas (USA), Inc.  
Ryan Hollinshead, P.E., Petroleum Engineer, COGCC