

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Wednesday, July 03, 2013 1:54 PM  
**To:** Dave.kubeczko@state.co.us  
**Subject:** FW: EnCana Oil & Gas (USA) Inc, Cuttings Area UWF H04 596 Site, SWSW Sec 34 T4S R96W, Garfield County, Form 2A (#400431667) Review

**Categories:** Operator Correspondence

**Scan No 2106682      CORRESPONDENCE      2A#400431667**

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**From:** Lind, Jennifer R. [mailto:[Jennifer.Lind@encana.com](mailto:Jennifer.Lind@encana.com)]  
**Sent:** Monday, July 01, 2013 1:34 PM  
**To:** 'Dave Kubeczko - DNR'  
**Subject:** RE: EnCana Oil & Gas (USA) Inc, Cuttings Area UWF H04 596 Site, SWSW Sec 34 T4S R96W, Garfield County, Form 2A (#400431667) Review

Dave, COA's 91 and 38 are acceptable. Here are Encana's comments regarding the remaining COA's:

COA 67 – We would like this COA removed. The H04, H04 cuttings pad, and connecting road infrastructure are all on Encana surface. There are no public lands, or other private landowners involved in this proposed project. We are in the process of creating/revising Encana's waste management documents for the Piceance. Providing a comprehensive MMP for cuttings management to the COGCC is part of that plan. However, the July 11 deadline is not consistent with our existing timeline. It is our opinion that an MMP is not required to be submitted specifically for this location as the cuttings are not being transported off of Encana's surface.

COA 68 – We would like this COA removed. Encana will handle cuttings for the H04 in the same manner that we would on any other drilling location, which would include robust stormwater BMPs to assure no offsite discharge of material, and collection of characterization samples to demonstrate compliance with Table 910-1. Cleared sample results will be provided to the COGCC in a Form 4 (Sundry) as part of standard documentation for onsite disposal of E&P waste. If remediation of the cuttings stockpile is necessary, we will submit a Form 27 (Remediation Workplan) to the COGCC to propose a remediation approach.

COA 47 – We would like this COA removed. For the following reasons it would set a very expensive precedence for Encana to agree to create an impervious area for cuttings exceeding Table 910-1, which is not required in Rule 907:

- In order to segregate cuttings that exceed Table 910-1, Encana would have to collect samples continuously through the drilling process, rather than characterize the entire stockpile after drilling is complete.
- Use of a liner guarantees repeated handling of drill cuttings.
- A liner adds no meaningful protection to the environment, cannot be left on location during reclamation, creates another waste stream (liner disposal), and is completely inconsistent with our current minimal handling approach.

Thank you,  
Jennifer

**Jennifer Lind**  
Regulatory Analyst  
t 720.876.5890  
c 720.839.5105

Encana Oil & Gas (USA) Inc.

Please note some Encana offices are closed the first and third Friday of each month.

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**From:** Dave Kubeczko - DNR [<mailto:dave.kubeczko@state.co.us>]  
**Sent:** Wednesday, June 26, 2013 8:33 PM  
**To:** Lind, Jennifer R.  
**Subject:** EnCana Oil & Gas (USA) Inc, Cuttings Area UWF H04 596 Site, SWSW Sec 34 T4S R96W, Garfield County, Form 2A (#400431667) Review

Jennifer,

I have been reviewing the Cuttings Area UWF H04 596 Site **Form 2A** (#400431667). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Encana Oil & Gas (USA) Inc (EnCana) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**General:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of cuttings area pad construction, spud of nearby North Parachute UWF H04 596 pad wells, and start of cuttings transport to site using Form 42 (the appropriate COGCC individuals will automatically be email notified).

**COA 67** - Operator must submit a Materials Management Plan (MMP) via a Form 4 Sundry to the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) by **July 11, 2013**, for approval prior to transporting cuttings from the North Parachute Ranch UWF H04 596 well pad to this location. This MMP must describe how the operator intends to comply with Rule 907; in particular, describe the operator's plans for handling the cuttings, bentonite, and frac sand (if applicable) that both meet and exceed the requirements of Table 910-1.

**COA 68** - All materials brought to this location that exceed the requirements in Table 910-1 will be placed in an area of the site that is completely segregated from materials that meet the requirements in Table 910-1. This area must be lined and bermed and appropriate BMPs need to be in place during the entire operational lifetime (no more than three years from date of start of construction). Sufficient 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.

**COA 47** - The area where cuttings that exceed the requirements of Table 910-1 will be stored/treated/amended must be constructed to be sufficiently impervious to contain any spill or release of material or any accumulations of fluids.

**COA 38** - The moisture content of any drill cuttings placed in a cuttings trench, area, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

Based on the 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 you have 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**  
**Western Colorado**

Colorado Oil & Gas Conservation Commission

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