

## Attachment A – Variance Request for Rule 908.b.(5).D

This Sundry Notice is intended to request a variance from the requirements in Rule 908.b.5.D for Encana Oil & Gas Company's N Parachute WF A15 596 Pit (Facility ID# 440582, Pit Facility ID# 428147).

Rule 908.b.5.D states: "Centralized facilities shall have a fire lane of at least ten (10) feet in width around active treatment areas and within the perimeter fence. In addition, a buffer zone of at least ten (10) feet shall be maintained within the perimeter fire lane."

The A15 pit was constructed on a well pad. Encana is currently in the process of permitting this pit as a Centralized E & P Waste Management Facility. This letter supports the Form 28 application. The pit was originally constructed on the edge of the pad to allow room for wells and other activities. In addition, the pad is located on a hillside with the pit built into the upslope side of the pad. This existing situation makes compliance with Rule 908.b.5.D extremely difficult.

Encana has familiarized Grand Valley Fire Protection District (GVFPD), the local fire protection agency, with the potential access issues that may be associated with the A15 596 Pit. Please see the attached letter from GVFPD confirming that they do not have any issues with the variance request and that they have the proper equipment to respond to an emergency at this facility.

The District is familiar with the location, terrain and conditions and is confident that the facility locations are easily accessible using any of the departments brush units, or other four-wheel or all-wheel drive equipment vehicles. The brush units are Ford FSSO 4WD trucks, which are similar to Ford vehicles in Encana's fleet. Encana personnel access these facilities via the access roads and parking areas with these vehicles routinely.

Chemicals are not stored at this facility and fire is highly unlikely due to the lack of flammable materials. However, a fire is the most likely emergency scenario. In the event that GVFPD vehicles could not directly access the facility, GVFPD has sufficient hoses to travel the short distance from the pad location to the pit. While the pit does not have the full ten (10) feet of emergency access zone and ten (10) feet of buffer zone, all areas of the facility are accessible using hoses.

Encana has also submitted a copy of our Emergency Response Plan and Emergency Evacuation Plan with the Form 28 application, detailing how emergencies are managed by Encana.

Encana respectfully submits this information in order to provide the COGCC the information required to grant a variance of Rule 908.b.5.D for the facility.