



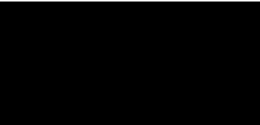
COLORADO

**Oil & Gas Conservation
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

May 11, 2015



Dear 

In December 2014, the Colorado Oil and Gas Conservation Commission (COGCC) received your complaint regarding low frequency “C-scale” noise at Encana’s Pratt pad located just north of the Vista Ridge neighborhood. With oversight from COGCC, Encana took several actions in an attempt to reduce the noise, but none of these lowered the noise to an acceptable level.

On December 12, after meeting with the COGCC, Encana decided to cease drilling on the Pratt pad as soon as the first well was completed. Unfortunately, drilling could not be stopped immediately because of the depth to which the well had been drilled at that point. Encana also agreed not to resume drilling on the Pratt pad, or to commence drilling on the nearby Consolidated Waste location, until it has identified and implemented a more effective way to control C-scale noise.

Existing COGCC rules related to C-scale noise require an operator to “obtain a low frequency noise impact analysis by a qualified sound expert, including identification of any reasonable control measures available to mitigate such low frequency noise impact” if C-scale noise exceeds 65 db(C). Commission Rule 802.d. Provided an operator takes these measures, the Commission does not have authority to impose a penalty for C-scale noise even when the levels are above 65db (C).

In this case, Encana did retain a qualified sound expert and took a series of actions to try and reduce the C-scale noise, including real time continuous noise monitoring, installing higher grade sound walls, installing sound blankets around generators and shale shakers, and removing unneeded equipment. Taking these actions met the requirements of Rule 802.d, even though the noise was not reduced below 65 db. Consequently, the COGCC does not intend to issue a violation to or seek a penalty from Encana for the C-scale noise.

The COGCC is committed to reviewing and modifying Rule 802.d., with the intent to establish an enforceable decibel limit for C-scale noise. The COGCC has been working with Colorado

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Commissioners: Thomas L. Compton - Chairman, Richard Alward, John H. Benton, DeAnn Craig,
James W. Hawkins, Tommy Holton, Andrew L. Spielman, Mike King, Dr. Larry Wolk

John W. Hickenlooper, Governor | Mike King, Executive Director, DNR | Matthew J. Lepore, Director



May 11, 2015

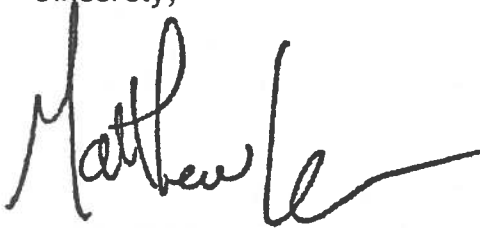
Page 2

State University researchers since September 2014 to gather technical data related to C-scale noise. The CSU researchers will also be advising the COGCC regarding enforceable standards for C-scale noise. The COGCC anticipates a rulemaking to change the noise rules will commence this fall.

The COGCC will work with Encana to ensure appropriate communication from Encana occurs prior to operations resuming on the Pratt pad. The COGCC also will take measures to:

1. Determine background daytime and nighttime noise levels;
2. Set an enforceable standard a few decibels above background levels;
3. Establish around-the-clock noise monitoring during drilling operations;
4. Require Encana to drill in phases so that no well is drilled "past the point of no return" if noise is not being controlled; and
5. Take other reasonable measures to avoid repeating the unacceptable circumstances that occurred last December.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Lepore". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Matthew J. Lepore
Director