



State of Colorado

Kubeczko, Dave <dave.kubeczko@state.co.us>

**FW: Entek GRB LLC, Robidoux 13-7H Pad, SWNE Sec 13 T12N R89W, Moffat County, Form 2A#400313097 Review**

Kubeczko, Dave <dave.kubeczko@state.co.us>  
To: Dave Kubeczko <dave.kubeczko@state.co.us>

Wed, Oct 24, 2012 at 2:06 PM

**Scan No 1293027      CORRESPONDENCE      2A#400313097**

----- Forwarded message -----

From: **David Smith** <DSmith@entekenergy.com>  
Date: Wed, Oct 24, 2012 at 1:04 PM  
Subject: FW: Entek GRB LLC, Robidoux 13-7H Pad, SWNE Sec 13 T12N R89W, Moffat County, Form 2A#400313097 Review  
To: "dave.kubeczko@state.co.us" <dave.kubeczko@state.co.us>  
Cc: "kim@banko1.com" <kim@banko1.com>

Dave, here are the 13-7H responses.

Will get the other to you ASAP

Dave Smith

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**From:** Tim Hopkins  
**Sent:** Wednesday, October 24, 2012 11:15 AM  
**To:** David Smith; kim@banko1.com  
**Subject:** RE: Entek GRB LLC, Robidoux 13-7H Pad, SWNE Sec 13 T12N R89W, Moffat County, Form 2A#400313097 Review

We have already proposed closed loop – so no issue

Rest are standard

**Tim T. Hopkins**

Entek GRB, LLC  
Regional Manager  
535 16 St., Suite 620  
Denver, CO 80202  
720-210-9129

866-435-9424 Fax

303-524-2985 Cell

thopkins@entekenergy.com

**From:** Kubeczko, Dave [<mailto:dave.kubeczko@state.co.us>]  
**Sent:** Tuesday, October 16, 2012 11:30 AM  
**To:** [kim@banko1.com](mailto:kim@banko1.com); David Smith  
**Subject:** Entek GRB LLC, Robidoux 13-7H Pad, SWNE Sec 13 T12N R89W, Moffat County, Form 2A#400313097 Review

Kim,

I have been reviewing the Entek GRB LLC, Robidoux 13-7H Pad, **Form 2A** (#400313097). COGCC would like to attach the following conditions of approval (COAs) to the Form 2A based on the data Entek has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS CI) or oil based muds (OBM) be used? has been marked **Yes**; therefore the following condition of approval (COA) will apply:

**COA 11** - A closed loop system must be implemented during drilling (which operator has indicated on the Form 2A); or, if a closed loop system drilling rig is not used/available, then an amended Form 2A will need to be submitted/approved to include a drilling pit, and a Form 15 Earthen Pit Permit will also need to be submitted/approved prior to construction of the pit (the drilling pit will be required to be lined, fenced, and netted). All cuttings generated during drilling with oil based muds or high chloride/TDS mud must be kept in containers, a lined/bermed portion of the well pad, or the lined drilling (if permitted and constructed) prior to offsite disposal. 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.

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

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**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 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Proposed BMPs attachment); 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 38** - The moisture content of any freshwater generated 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.

**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, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. 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**

Colorado Oil & Gas Conservation Commission

Northwest Area Office

707 Wapiti Court, Suite 204

Rifle, CO 81650

Phone: (970) 625-2497x5

FAX: (970) 625-5682

Cell: (970) 309-2514

[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)

