

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Friday, May 24, 2013 3:44 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Elm Ridge Exploration Company LLC (Elm Ridge) Harmon-N33N8 17 SWSW Pad, SWSW Sec 17 33N 8W, LaPlata County, Form 2A#400405072

**Categories:** Operator Correspondence

**Scan No 2106612      CORRESPONDENCE      2A#400405072**

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Friday, May 24, 2013 3:42 PM  
**To:** [tlindeman@elmridge.net](mailto:tlindeman@elmridge.net)  
**Subject:** Elm Ridge Exploration Company LLC (Elm Ridge) Harmon-N33N8 17 SWSW Pad, SWSW Sec 17 33N 8W, LaPlata County, Form 2A#400405072

Terry,

I have been reviewing the Elm Ridge Exploration Company LLC (Elm Ridge) Harmon-N33N8 17 SWSW Pad **Form 2A** (#400400405072). COGCC will attach the following conditions of approval (COAs) to the Form 2A based on the data Elm Ridge 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 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 drill cuttings in a cuttings area, 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** – If the well is to be hydraulically stimulated, all 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.

Based on the information provided in the Form 2A by Elm Ridge, COGCC will attach these COAs to the Form 2A permit, Elm Ridge does not need to respond, unless you have questions or concerns with details in this email. If you have any questions, please do not hesitate to call me at [\(970\) 309-2514](tel:9703092514) (cell), or email. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**  
**Western Colorado**

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