

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Friday, September 20, 2013 1:23 PM
To: dave.kubeczko@state.co.us
Subject: FW: Dejour Energy (USA) Corporation, Well Pad 15A Pad, NWSW Sec 15 T6N R91W, Garfield County, Form 2A #400210492 Review

Categories: Operator Correspondence

Scan No 2106761 CORRESPONDENCE 2A#400210492

From: Rick Obernolte [mailto:rickobe1@aol.com]
Sent: Thursday, September 19, 2013 10:11 AM
To: dave.kubeczko@state.co.us; ghaeefe@dejour.com
Cc: vrasho@dejour.com; kkuhn@dejour.com; rrichardson@dejour.com; ngmut@dejour.com
Subject: Re: Dejour Energy (USA) Corporation, Well Pad 15A Pad, NWSW Sec 15 T6N R91W, Garfield County, Form 2A #400210492 Review

Dave,

Good morning,

Following up on our telephone conversation this morning I corresponded with Gary Haefele. A few minutes ago I received an e-mail from Gary stating that he accepts the proposed COAs.

Thanks for your help and patience.

Rick
Rick Obernolte
Access Environmental, LLC
106 South White Tail Drive
Franktown, Colorado 80116-8825
Tel: (303) 660-9633
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rickobe1@aol.com

-----Original Message-----

From: Dave Kubeczko - DNR <dave.kubeczko@state.co.us>
To: ghaefe <ghaeefe@dejour.com>
Cc: Rick Obernolte <rickobe1@aol.com>
Sent: Tue, Sep 3, 2013 12:08 pm
Subject: Dejour Energy (USA) Corporation, Well Pad 15A Pad, NWSW Sec 15 T6N R91W, Garfield County, Form 2A #400210492 Review

Gary,

I have been reviewing the Well Pad 15A **Form 2A** (#400210492). COGCC would like to attach the following conditions of approval (COAs) based on the data EE3 LLC has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

General: The following previously attached 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 9 - Reserve pit, or any other pit used to contain/hold fluids, if constructed, must be lined or a closed loop system (which operator has indicated on the form 2A) must be implemented during drilling.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.

COA 23 - Operator must ensure secondary containment for any volume of fluids (excluding freshwater, unless stored in a large volume aboveground storage tank [LVT]), contained at well site during drilling and completion operations; 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 71 - Operator shall design and construct the access road utilizing all available soils, geologic, landslide, and hydrogeologic information.

COA 81 - During all construction, drilling, and completion phases at this location, operator shall be monitoring the wildfire potentials daily and have the appropriate additional equipment and measures in place. This may include smoking bans and additional fire fighting equipment. Operator shall consult with the NFS as necessary.

COA 44 - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COA 76 - Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 38 - The moisture content of any drill cuttings in a cuttings trench, area, 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 onsite, they must also meet the applicable standards of table 910-1.

COA 25 - If the well is to be hydraulically stimulated, then 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.

Groundwater Baseline Sampling:

COA 9 - Operator shall comply with Rule 609. STATEWIDE GROUNDWATER BASELINE SAMPLING AND MONITORING.

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
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Western Colorado

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