

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Friday, December 27, 2013 10:57 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Elm Ridge Exploration Company LLC (Elm Ridge), IGE 127 Pad, SESE Sec 8 33N 8W, La Plata County, Form 2A#400481874

**Categories:** Operator Correspondence

**Scan No 2106829      CORRESPONDENCE      2A#400481874**

**Discussed COAs with Terry Lindeman on 12-16-13; verbal concurrence.**

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Monday, December 09, 2013 1:47 PM  
**To:** [tlindeman@elmridge.net](mailto:tlindeman@elmridge.net)  
**Subject:** Elm Ridge Exploration Company LLC (Elm Ridge), IGE 127 Pad, SESE Sec 8 33N 8W, La Plata County, Form 2A#400481874

Terry,

I have been reviewing the Elm Ridge Exploration Company LLC (Elm Ridge) IGE 127 Pad **Form 2A** #400400481874. COGCC would like to 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.

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

**COA 91** - Notify the COGCC 48 hours prior to start of pad reconstruction/regarding (if necessary), 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).

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

**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 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 44** - The access road will be maintained 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 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.

**Drilling/Completions:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of any 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.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A if any temporary/permanent surface or buried pipelines (poly or steel) are used during operations at the well pad location:

**COA 45** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network. Operator shall notify the COGCC Oil and Gas Location Assessment (OGLA) Specialist for Western Colorado (Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)) and the COGCC Field Inspection Supervisor for Southwest Colorado (Steve Labowskie; email [steve.labowskie@state.co.us](mailto:steve.labowskie@state.co.us)) 48 hours prior to testing surface poly/steel or buried poly/steel pipelines.

COGCC would appreciate your concurrence with attaching the COGCC 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**  
**Western Colorado**

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
Rifle, CO 81650  
FAX: [\(970\) 625-5682](tel:(970)625-5682)  
Cell: [\(970\) 309-2514](tel:(970)309-2514)  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)

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