

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, July 21, 2014 8:40 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** FW: EE3 LLC, Mutual 01-17H Pad, NWNW Sec 17 T7N R80W, Jackson County, Form 2A# 400593227 Review

**Categories:** Operator Correspondence

**Scan No 2107049      COGCC CORRESPONDENCE      2A#400593227**

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, July 16, 2014 1:03 PM  
**To:** [krodell@upstreampm.com](mailto:krodell@upstreampm.com)  
**Subject:** EE3 LLC, Mutual 01-17H Pad, NWNW Sec 17 T7N R80W, Jackson County, Form 2A#400593227 Review

Kim,

I have been reviewing the Mutual 01-17H Pad **Form 2A** (#400593227). COGCC would like to attach the following conditions of approval (COAs) based on the information and data EE3 has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following condition of approval (COA) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad reconstruction/regrading, rig mobilization, spud, pipeline testing, start of hydraulic stimulation operations, and start of flowback 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 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 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 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (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, the drill cuttings must also meet the applicable standards of table 910-1.

**COA 25** - If the wells are be hydraulically stimulated, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or storage vessel 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 constructed to be sufficiently impervious to contain any spilled or released material.

Based on the information provided in the Form 2A by EE3, COGCC will attach these COAs to the Form 2A permit, EE3 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 (cell), or email. Thanks.

Dave

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