

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, October 28, 2014 10:22 AM
To: dave.kubeczko@state.co.us
Subject: FW: EE3 LLC, Gregory #5-09H Pad, SWSW Sec 9 T7N R80W, Jackson County, Form 2A#400654565 Review

Categories: Operator Correspondence

Scan No 2107119 CORRESPONDENCE 2A#400654565

From: Jennifer Grosshans [mailto:jgrosshans@petro-fs.com]
Sent: Tuesday, October 28, 2014 7:39 AM
To: Dave Kubeczko - DNR
Cc: Regulatory members
Subject: RE: EE3 LLC, Gregory #5-09H Pad, SWSW Sec 9 T7N R80W, Jackson County, Form 2A#400654565 Review

Dave,

The building that is listed at 408 feet to the Southwest is a Calving Barn. On the Location Drawing it states that "No reclamation is required due to current and future use of area (Stack Yard)."

All COAs that you have attached are good to attach to the Form 2A.

Please let me know if we may be of further assistance. Thank you.

Jennifer Grosshans
Regulatory Analyst

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Monday, October 20, 2014 9:11 AM
To: Regulatory members
Subject: EE3 LLC, Gregory #5-09H Pad, SWSW Sec 9 T7N R80W, Jackson County, Form 2A#400654565 Review

Ann,

I have been reviewing the Gregory #5-09H Pad **Form 2A** (#400654565). Please clarify what the Building is that is listed at 408 feet (what direction) from the well. Please clarify why the well pad will not be reduced in size during interim reclamation. 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 construction, 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 after precipitation events), and maintained in good condition.

COA 44 - The access road will be constructed and 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 (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 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, the drill cuttings must also meet the applicable standards of table 910-1.

COA 25 - If the wells are to 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.

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following condition of approval (COA) will apply:

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.

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
Western Colorado



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