

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Monday, April 20, 2015 2:58 PM
To: dave.kubeczko@state.co.us
Subject: FW: EE3 LLC, Grizzly 3-36H Pad, NWNW Sec 36 T8N R81W, Jackson County, Form 2A#400786875 Review
Attachments: Grizzly 3-36 OGLA Multi-Well Plan.pdf
Categories: Operator Correspondence

Scan No 2107340 CORRESPONDENCE 2A#400786875

From: krodell@upstreampm.com [mailto:krodell@upstreampm.com]
Sent: Tuesday, March 31, 2015 9:57 AM
To: Dave Kubeczko - DNR
Subject: RE: EE3 LLC, Grizzly 3-36H Pad, NWNW Sec 36 T8N R81W, Jackson County, Form 2A#400786875 Review

Dave,

Attached is the Multi-Well Plan for the Grizzly. Please add to the OGLA documents. Sorry for the omission.

Kim

From: krodell@upstreampm.com
Sent: Monday, March 30, 2015 12:21 PM
To: 'Dave Kubeczko - DNR'
Subject: RE: EE3 LLC, Grizzly 3-36H Pad, NWNW Sec 36 T8N R81W, Jackson County, Form 2A#400786875 Review

Dave,

I have also been meaning to follow up on this. I have requested the necessary plat (sorry we missed this) and will e-mail it as soon as I receive it. We are going to apply for the second APD once we have a chance to evaluate the first well.

Let me know if you need more in the interim.

Thank you.

Kim

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, March 20, 2015 5:32 PM
To: krodell@upstreampm.com
Subject: EE3 LLC, Grizzly 3-36H Pad, NWNW Sec 36 T8N R81W, Jackson County, Form 2A#400786875 Review

Kim,

I have been reviewing the Grizzly 3-36H Pad **Form 2A** (#400786875). Please verify the number of wells for this location. The Form 2A Facilities Section indicates two (2) wells with corresponding equipment (2 separators, 2 heater treaters) but only one (1) Form 2 has been submitted and there is no Multi-Well Plan showing two (2) wells. 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, start of flowback operations (if different than start of hydraulic stimulation operations), and pipeline testing 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 [per CDPHE requirements] and after significant 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 drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. After drilling and completion operations have been completed, the drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must meet the applicable standards of Table 910-1. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location. No offsite disposal of cuttings to another oil and gas location shall occur without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. Commercial disposal of drill cuttings will only require notification to COGCC via a Form 4 Sundry Notice.

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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