

## Dave Kubeczko - DNR

---

**From:** Dave Kubeczko - DNR  
**Sent:** Wednesday, June 26, 2013 7:32 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: EE3 LLC, Marr Pad, NWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400392924) Review

**Categories:** Operator Correspondence

**Scan No 2106666      CORRESPONDENCE      2A#400392924**

---

**From:** Clay Doke [mailto:[cdoke@iptengineers.com](mailto:cdoke@iptengineers.com)]  
**Sent:** Thursday, June 13, 2013 10:39 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: EE3 LLC, Marr Pad, NWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400392924) Review

Dave,

We agree with an approve of the below cited COA's.

If you have any questions please do not hesitate to ask.

**Clayton L. Doke**  
Senior Engineer



2154 West Eisenhower Boulevard  
Loveland, Colorado 80537  
o: 970-669-7411  
c: 720-560-2700  
[cdoke@iptengineers.com](mailto:cdoke@iptengineers.com)  
[www.petersonenergy.com](http://www.petersonenergy.com)  
[www.iptengineers.com](http://www.iptengineers.com)

---

**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Sunday, June 09, 2013 10:13 AM  
**To:** Clay Doke  
**Subject:** EE3 LLC, Marr Pad, NWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400392924) Review

Clayton,

I have been reviewing the Marr Pad **Form 2A** (#400392924). 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 must be implemented during drilling.

**COA 44** - The access road will be constructed to prevent sediment migration from the access road to nearby surface water or any drainages leading to other nearby surface waters.

**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 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** - 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](tel:9703092514) (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  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)

 *Please consider the environment before printing this e-mail*