

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Tuesday, August 20, 2013 2:13 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: EE3 LLC, Hebron Central Facility Pad, SWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400450827) CPW Review and Updated Wildlife BMPs

**Categories:** Green Category

**Scan No 2106727**

**CPW CORRESPONDENCE and PROPOSED BMPS**

**2A#400450827**

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**From:** Taylor Elm - DNR [mailto:[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)]  
**Sent:** Wednesday, August 14, 2013 2:49 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** Michael Warren - DNR  
**Subject:** Fwd: Updated BMPs

Hi Dave,

Concurrence from EE3 LLC regarding wildlife BMPs on the following Form2As:

Mutual Pad 4-30 Doc#: 400391955  
Coalmont 3-13H Doc#: 400448337  
Hebron Central Facilities Doc#: 400450827

Thanks,

Taylor Elm

Land Use Specialist, NW Region  
Colorado Parks and Wildlife  
0088 Wildlife Way  
Glenwood Springs, CO 81601  
(970) 947-2971  
[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)

----- Forwarded message -----

**From:** Doug Sandridge <[dsandridge@ee3llc.com](mailto:dsandridge@ee3llc.com)>  
**Date:** Wed, Aug 14, 2013 at 2:14 PM  
**Subject:** RE: Updated BMPs  
**To:** Taylor Elm - DNR <[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)>

yes

**From:** Taylor Elm - DNR [mailto:[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)]  
**Sent:** Tuesday, August 13, 2013 8:20 AM  
**To:** Doug Sandridge  
**Subject:** Re: Updated BMPs

Thanks Doug,

Sounds like nothing to worry about on the Mutual Pad then. For technicality's sake, are we still in concurrence on the remaining BMPs?

Proposed BMPs:

### **EE3 Mutual Pad 4-30**

Wildlife Concerns: This location is within greater sage-grouse Preliminary Priority Habitat (PPH) and production area Sensitive Wildlife Habitat (SWH). Additionally, this location is within 1.5 miles of two active greater sage-grouse leks (Coalmont Lek and Migan Lek). Based on these wildlife concerns, CPW recommends the following BMPs:

1. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.
2. Where oil and gas activities must occur within 4 miles of greater sage-grouse leks or within other mapped greater sage-grouse breeding or summer habitat, conduct these activities outside the period between March 1 and June 30.
3. Restrict post development well site visitations to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to May 15).

In addition to these BMPs, CPW would like to bring to attention the use by greater sage-grouse of the riparian corridor east of this location during August, September, and October. To the extent possible, CPW recommends minimizing noise impacts and visitation to this site during these months to mitigate impacts to grouse.

### **EE3 Coalmont 3-13H Central Facilities Location**

Wildlife Concerns: This location is within greater sage-grouse PPH and production area SWH. Additionally, this location is within 1.5 miles of an active sage grouse lek (Coalmont Lek). The proposed location is near County Road 24 and the railroad tracks, but given the track is abandoned and minimal traffic on the county road, CPW still recommends the following BMPs in addition to the operator's attached wildlife BMPs:

1. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.

2. Restrict post development site visitations to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to May 15).
3. Use hospital grade mufflers for compressors, pump jacks, or other motors necessary to run operations at the site. Mufflers will be pointed upward to dissipate potential vibration.
4. Consider the use of internal combustors for disposal of gasses instead of traditional flaring techniques.
5. Install and utilize bear-proof dumpsters and trash receptacles for all food-related trash on location, following COGCC Rule 1204 a-1.

### **EE3 Hebron Central Facilities Location**

Wildlife Concerns: This location is within greater sage-grouse PPH and production area SWH. Given these concerns, CPW recommends the following BMPs for this location:

1. Establish company guidelines to minimize wildlife mortality from vehicle collisions on roads.
2. Where oil and gas activities must occur within 4 miles of greater sage-grouse leks or within other mapped greater sage-grouse breeding or summer habitat, conduct these activities outside the period between March 1 and June 30.
3. Use hospital grade mufflers for compressors, pump jacks, or other motors necessary to run operations at the site. Mufflers will be pointed upward to dissipate potential vibration.
4. Consider the use of internal combustors for disposal of gasses instead of traditional flaring techniques.
5. Install and utilize bear-proof dumpsters and trash receptacles for all food-related trash on location, following COGCC Rule 1204 a-1.

In addition to the aforementioned BMPs, CPW recommends these additional measures whenever possible:

- burying electrical utility lines
- utilizing below-ground electric powered pump jacks to reduce noise disturbance
- piping water from source to location for fracking operations to reduce large truck traffic
- using internal combustors for gas disposal instead of conventional flaring techniques

Thank you for your feedback regarding these BMPs. If these are agreeable I can get them entered and approve the Form 2As as soon as possible.