

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, August 26, 2013 4:14 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) Review

**Categories:** Operator Correspondence

**Scan No 2106726      CORRESPONDENCE      2A#400450827**

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**From:** Clay Doke [mailto:[cdoke@iptengineers.com](mailto:cdoke@iptengineers.com)]  
**Sent:** Friday, August 23, 2013 1:05 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: EE3 LLC, Hebron Central Facility Pad, SWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400450827) Review

Good afternoon Dave,

Operator agrees with and approves of the COA's as listed below.

Thanks, and don't hesitate to let me know if you need anything else from us.

Clay.

**Clayton L. Doke**  
Senior Engineer



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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Tuesday, August 20, 2013 1:53 PM  
**To:** Clay Doke  
**Subject:** EE3 LLC, Hebron Central Facility Pad, SWNE Sec 7 T7N R80W, Jackson County, Form 2A (#400450827) Review

Clayton,

I have been reviewing the Hebron Central Facility Pad **Form 2A** (#400450827). COGCC would like to attach the following conditions of approval (COAs) based on the information and 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 conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of compressor station pad construction and start of operations using Form 42 (the appropriate COGCC individuals will automatically be email notified).

**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 facilities pad site during 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 compressor pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 48** - The surface soils and materials are fine-grained and moderately unconsolidated; therefore the facility pad shall be constructed as quickly as possible and appropriate BMPs need to be in place both during, after facility pad construction completion, as well as during all operations. Standard stormwater BMPs must be implemented at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater runoff.

**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.

**COA 59** - All tanks and aboveground vessels containing fluids or chemicals used in the storage and transmission processes and operations must have secondary containment structures (which may include, but is not limited to, double-walled tanks). All secondary containment structures/areas must be lined. Operator must ensure 110 percent secondary containment for the largest structure containing fluids within each bermed area of the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

**COA 6** - Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.

**COA 74** - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location and the facility shall comply with the operators SPCC Plan.

**COA 29** - Within 30 calendar days of conclusion of the initial grading and earthwork and facility equipment placement, operator shall submit as-built drawings, including plan view and cross-sections (with perpendicular axes), prepared and stamped by a Professional Land Surveyor or Professional Engineer; including the facility pad, location of all equipment and secondary containment, stormwater BMPs, and the access road.

**COA 79** - 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 32** - Surface water samples from the unnamed stream (one upgradient and one downgradient to the facility location) located to the south-southeast of the facility (if water is present), shall be collected prior to the facility use and every 12 months (until facility closure) to evaluate potential impacts from tank facility operations. At a minimum, the surface water samples will be analyze for the following parameters: major cations/anions (chloride, fluoride, sulfate, sodium); total dissolved solids (TDS); and BTEX/DRO.

COGCC would appreciate your concurrence with attaching the COGCC 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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