



STATE OF  
COLORADO

Noto - DNR, John <john.noto@state.co.us>

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## Form 10 # 2485976 EOG to EE3 LLC

6 messages

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**Noto - DNR, John** <john.noto@state.co.us>

Fri, Sep 6, 2013 at 2:36 PM

To: rhartshorn@ee3llc.com

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>, Alex Fischer - DNR <alex.fischer@state.co.us>, Teri Ikenouye - DNR <teri.ikenouye@state.co.us>, John Axelson - DNR <john.axelson@state.co.us>

September 6, 2013

J. Michael Schween

EOG Resources, Inc.

Ruth Hartshorn

EE3 LLC

[RHARTSTORN@EE3LLC.COM](mailto:RHARTSTORN@EE3LLC.COM)

Form 10# 2485976 - Submitted to change the registered operator of Wells and Production Facilities

From: EOG Resources Inc., Operator #27742

To: EE3 LLC, Operator #10450

Ruth,

The COGCC is in the process of reviewing the above-referenced Form 10. During our review, the unresolved issues (listed below and on the attached spreadsheet) were identified. The information on the spreadsheet is available on the COGCC website (Database and GIS). In order to complete the processing of the Form, we will require written assurance from EE3 that these issues will be addressed within the given time frames.

- 1) **Pit – Facility ID #291040** - Form 15, Pit Permit was issued.

*Within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 2) **Pit – Facility ID # 294712** - Form 15, Pit Permit was issued.

*Within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 3) **Pit – Facility ID # 295297** - Not listed on Form 10, is related to well API # 05-057-06467, Form 15, Pit Permit was issued.

*Within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 4) **Pit – Facility ID # 295300** - Form 15, Pit Permit was issued.

*Within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 5) **Pit – Facility ID # 298265** – Not listed on Form 10, is related to well API # 05-057-06465, Form 15, Pit Permit was issued.

*Include pit on the Form 10, within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 6) **Pit – Facility ID # 295298** – Not listed on Form 10, is related to well API # 05-057-06466, Form 15, Pit Permit was issued.

*Include pit on the Form 10, within 30 days of approval of the Form 10, conduct the following action: Submit a Form 27 Remediation Workplan with description of pit closure per 900-Series Rules.*

- 7) **Well – API # 05-057-06501** - Pit outline near the well was visible on 2011 aerial photos on the COGCC GIS, however, there is no associated Form 15. Pit is not on Form 10.

*No action required for approval of the Form 10, Upon request by COGCC, report status of pit and closure plans if applicable or provide documentation of pit closure per 900-Series Rules.*

- 8) **Well – API # 05-057-06472** - Pit near the well was visible on 2009 aerial photos on the COGCC GIS, however, there is no associated Form 15. Pit is not on Form 10.

*No action required for approval of the Form 10, Upon request by COGCC, report status of pit and closure plans if applicable or provide documentation of pit closure per 900-Series Rules.*

Upon Receipt of EE3's written commitment that the terms outlined above will be addressed, the COGCC will complete the processing of the Form 10. The selling operator, EOG Resources, also has the option of closing pits under their name and a Form 10 transfer of ownership would not be necessary for those pits.

Please send the Form 15s, Form 27s and other correspondence to me and I will forward to the appropriate person. Questions or concerns may be directed to myself or to the Environmental Protection Specialist (see the Map of Environmental Staff Areas of Responsibility on the COGCC website). Please feel free to call or email with questions or concerns.

Best Regards,

John

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John Noto, P.G.  
Oil and Gas Location Specialist  
Colorado Oil and Gas Conservation Commission