

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Friday, October 31, 2014 8:16 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: EE3 LLC Gregory #5-09H Pad Form 2A Doc 400654565

**Importance:** High

**Categories:** Operator Correspondence

Scan No 2107127

CORRESPONDENCE, CUTTINGS WASTE MANAGEMENT PLAN

2A#400654565

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**From:** Ann Stephens [mailto:[astephens@petro-fs.com](mailto:astephens@petro-fs.com)]  
**Sent:** Friday, October 31, 2014 7:41 AM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Cc:** Jennifer Grosshans; Jeffrey Annable  
**Subject:** EE3 LLC Gregory #5-09H Pad Form 2A Doc 400654565  
**Importance:** High

Morning Dave,

Pursuant to our conversation yesterday, please change/add the following language to the Form 2A for the Gregory 5-09H:

**1. DRILLING WASTE MANAGEMENT PROGRAM:**

- Please change Cuttings Disposal Method to "Other" (no trench will be used).
- Eco-Sponge:

EE3 LLC proposes to use Eco-Sponge for the treatment/remediation of drill cuttings within the confines of the Gregory #05-09H drilling pad. Onsite drilling personnel will oversee the application and management protocols (mixing, staking, etc.) of the cuttings/Eco-Sponge mixture in an area to be bermed along three sides.

The cuttings/Eco-Sponge mixture will be tested to determine compliance with COGCC regulations, including applicable Table 910-1 concentration levels. A commercial laboratory certified to perform the testing according to COGCC specified methods will be utilized. Once testing determines that the cuttings/Eco-Sponge mixture are determined "clean" and are compliant with COGCC regulations for disposal, then the cuttings will either be disposed of to an appropriate landfill, or left on location and spread to an even depth to be seeded during interim reclamation.

**2. LAND USE RECLAMATION:**

- EE3, LLC has the following language in an Amendment to a Surface Use Agreement that covers the Gregory #05-09H location:

**Restoration of Certain Well Pads & Facility Sites.** Surface Owner and Operator have agreed that Operator shall be permitted to construct the following well pads and facility sites in Jackson County, Colorado:

**Ray Ranch Central Facility** located in SE/4 SW/4 of Section 32-T8N-R80W (located at the site of an abandoned saw mill).

**Gregory 5-09H Well Pad** located in the SW/4 SW/4 Section 9-T7N-R80W (located on an existing improved hay stack yard).

**Janet 1-05H Well Pad** located in the NE/4 NE/4 Section 5-T7N-R80W (located on an existing improved hay stack yard).

If Operator constructs any or all of these locations, Operator shall not be required to perform any interim reclamation. When Operator permanently abandons each of these well pads and facilities, Operator is specifically precluded from performing any restoration. Surface Owner values the improvements made by Operator and wants to use the sites for its own ranching purposes after Operator is finished.

The landowner has agreed verbally to this language but has not yet had a chance to sign and return the Amendment to EE3. Once signed and available, we will submit the official document to the COGCC via sundry.

Please advise if this information satisfies COGCC requests and enables the permit to pass final approval today. Many thanks for all your guidance.

Respectfully,

**Ann Stephens**  
**Regulatory Manager**  
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