

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, February 22, 2012 3:40 PM
To: Kubeczko, Dave
Subject: FW: Kinder Morgan CO2 CO LP, HA 4 Pad, NWSE Sec 29 T38N R18W, Montezuma County, Form 2A (#400227363) Review

Categories: Orange - Operator Correspondence

Scan No 2034161 CORRESPONDENCE 2A#400227363

From: Belanger, Paul [mailto:paul_belanger@kindermorgan.com]
Sent: Tuesday, February 21, 2012 10:23 AM
To: Kubeczko, Dave; 'Therese Hoff'
Cc: Clayton, Bob
Subject: Reviews/COAs for HA4, YA6, YB6, YG1 and YG2

Terri and Dave,

Terri, we acknowledge the receipt of your emails from Dave Kubeczko asking for COAs ofr the 5 wells listed below and acknowledge the Water Resource changes Dave has made for the:

- YA6 from 0 cgs to 195' cgs
- And YB6 FROM 210' cgs to 195' cgs

Regarding the other COAs cited:

- Construction (section 6) COA11, 12, 38 and 39;
- General - COA23, COA5 and COA29 and
- General H2S COA49

Kinder Morgan has no problem with the proposed COAs, expects them and will adhere to them as requested.

Please feel free to Contact Bob Clayton and/or myself should you need further information.

Acknowledging the following emails from Dave: **From:** "Kubeczko, Dave" <Dave.Kubeczko@state.co.us> :

Date: Fri, 17 Feb 2012 12:16:59 -0700**To:** <dunmire@ecosphere-services.com>**Subject:** Kinder Morgan CO2 CO LP, **HA 4 Pad**, NWSE Sec 29 T38N R18W, Montezuma County, Form 2A (#400227363) Review

Date: Fri, 17 Feb 2012 12:15:28 -0700**To:** <dunmire@ecosphere-services.com>**Subject:** Kinder Morgan CO2 CO LP, **YA 6 Pad**, NESE Sec 13 T37N R18W, Montezuma County, Form 2A (#400224212) Review

Date: Fri, 17 Feb 2012 12:14:45 -0700**To:** <dunmire@ecosphere-services.com>**Subject:** Kinder Morgan CO2 CO LP, **YB 6 Pad**, NWNW Sec 24 T37N R18W, Montezuma County, Form 2A (#400224235) Review

Date: Fri, 17 Feb 2012 12:16:01 -0700**To:** <dunmire@ecosphere-services.com>**Subject:** Kinder Morgan CO2 CO LP, **YG 1 Pad**, SWNE Sec 14 T37N R18W, Montezuma County, Form 2A (#400224242) Review

Date: Fri, 17 Feb 2012 12:16:33 -0700**To:** <dunmire@ecosphere-services.com>**Subject:** Kinder Morgan CO2 CO LP, **YG 2 Pad**, NESW Sec 14 T37N R18W, Montezuma County, Form 2A (#400224253) Review

Paul E. Belanger, Geologist
Regulatory Contractor @ Kinder Morgan
cell 303-249-7966

If you need to contact someone in Cortez office please call 970-882-2464

From: Kubeczko, Dave

Sent: Friday, February 17, 2012 12:17 PM

To: 'dunmire@ecosphere-services.com'

Subject: Kinder Morgan CO2 CO LP, HA 4 Pad, NWSE Sec 29 T38N R18W, Montezuma County, Form 2A (#400227363) Review

Carolyn,

I have been reviewing the HA 4 Pad **Form 2A** (#400227363). COGCC would like to attach the following conditions of approval (COAs) based on the information submitted by Kinder Morgan on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used? has been marked **Yes**; therefore the following conditions of approval (COAs) will apply:
 - COA 11** - Either a lined drilling pit or closed loop system must be implemented.
 - COA 12** - Production pit or any other pit constructed to hold fluids or salt based cuttings must be lined.
 - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts prior to offsite disposal.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.
2. **General:** The following conditions of approval (COAs) will apply:
 - COA 23** - Operator must ensure 110 percent 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, and maintained in good condition.
 - 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 25** - If the well is to have hydraulic fracturing treatment, 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 or pit 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.
3. **General:** Due to the potential for H₂S in this area, the following condition of approval (COA) will also apply:
 - COA 49** - All personnel must be H₂S trained and proper air monitoring for H₂S must be implemented during drilling, completion, and production operations. Emergency response plan for H₂S must be onsite at all times.

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 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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