

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 21, 2010 5:23 PM
To: Kubeczko, Dave
Subject: FW: Kinder Morgan CO2 CO LP, Goodman Point 20-21 Pad, SESW Sec 34 T37N R18W, Montezuma County, Form 2A (#2583548) Review

Categories: Purple Category

Scan No 2033409 CORRESPONDENCE 2A#2583548

From: Clayton, Bob [mailto:Bob_Clayton@kindermorgan.com]
Sent: Thursday, September 09, 2010 3:39 PM
To: Kubeczko, Dave
Subject: RE: Kinder Morgan CO2 CO LP, Goodman Point 20-21 Pad, SESW Sec 34 T37N R18W, Montezuma County, Form 2A (#2583548) Review

Hi Dave, in response to you e-mail below pertaining to the well pads for GP 20-21, 22-23 and 24-25 please receive the following comments; (since all 3 of your e-mails were very similar I will respond in a general fashion)

Item Comment

1 I can use some help or an explanation on the pit rules and would also have some questions concerning some of the information requested on the form 15.

2 We accept the COA's listed here but I would still like some clarification pertaining to pit rules.

3 I think what Ecosphere (author of these 2A's) was looking at is the closest surface water that is actually live which would probably be Dove Spring. I also see the dry washes you are mentioning in each of these so I have no problem with you making the distance changes and appreciate your willingness to do so.

4 I could not find any evidence of the water well's they referenced either??? I also find the Ive's well to be the closest to each of these and the Shell well to be the second closest. Again I appreciate your willingness to make these changes for me.

5 I have no problem with any of the COA's you have listed in items 5 as they are all planned on.

I hope the use of e-mail will be satisfactory for the changes needed for correcting the form 2A's we are dealing with here.

Thanks for all of you help and please contact me with any other needs.

Bob

Bob Clayton
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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, September 08, 2010 6:00 PM
To: Clayton, Bob
Subject: Kinder Morgan CO2 CO LP, Goodman Point 20-21 Pad, SESW Sec 34 T37N R18W, Montezuma County, Form 2A (#2583548) Review

Bob,

I have been reviewing the Goodman Point 20-21 Pad **Form 2A** (#2583548). COGCC requests the following clarifications regarding the data Kinder Morgan has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. In addition, since these are proposed CO₂ wells, this location will be considered a New Location on the Form 2A, rather than an Amend Existing Location. I have made this change.

1. **Facilities (Section 5):** Based on a review of the construction drawings, there appears that there will be two pits constructed at this location (one reserve pit [drilling pit] and one salt water pit [production pit/special purpose pit]). If these pits will be constructed, they need to be marked as a drilling pit and either a production or special purpose pit on the Form 2A and Form 15s (Earthen Pit Report/Permit) need to be submitted. I can make the change if you send an email with this request. In addition, if tanks, separators, or other equipment are planned for this location, COGCC would appreciate that information to complete the Form 2A review process.
2. **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/special purpose pit must be lined.
3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 2226 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent streams (including ephemeral streams, irrigation ditches, and drainages), as well as, perennial streams. COGCC's review indicates there is an intermittent stream located approximately 1586 feet to the southwest (as shown on the USGS Topographic Map). I can make the change if you send me an email with this request.
4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 160 feet bgs for a well located 5491 feet from the proposed well pad. COGCC's review could not find any water well at this distance. Can you confirm the information for this well (Permit No., owner, depth to groundwater). Otherwise; COGCC's review did locate two water wells: one well (Permit No. 18230-Ives, domestic well) located approximately 3.01 miles (15893 feet) to the northeast, with a total depth of 210 feet bgs and a depth to groundwater of 195 feet bgs; the other well (Permit No. 33026-Shell Western, industrial well) located approximately 2.47 miles (13042 feet) to the east, with a total depth of 160 feet bgs and an estimated depth to groundwater of 135 feet bgs (based on the perforated interval). I believe these wells are indicative of groundwater conditions in this area. I can make the change if you send me an email with this request.
5. **General:** Due to the potentially permeable nature of the surface material in this area, 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., BMPs associated with stormwater management) sufficiently protective of the

nearby surface water.

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. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.

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.

COA 44 - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COGCC would appreciate your concurrence with attaching these COAs (items 2 and 5) to the Form 2A permit prior to passing the OGLA review. The other issues (items 1, 3, and 4) also need to be address prior to permit approval. 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
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