

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, May 30, 2011 8:33 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: XTO Energy, Jones KK #2, NENE Sec 26 T33N R7W, La Plata County, Form 2A (#400163897) Review

**Categories:** Orange - Operator Correspondence

Scan No 2033844      CORRESPONDENCE      2A#400163897

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**From:** Kubeczko, Dave  
**Sent:** Monday, May 30, 2011 8:32 AM  
**To:** [Kelly\\_kardos@xtoenergy.com](mailto:Kelly_kardos@xtoenergy.com)  
**Subject:** XTO Energy, Jones KK #2, NENE Sec 26 T33N R7W, La Plata County, Form 2A (#400163897) Review

Kelly,

I have been reviewing the Jones KK #2 **Form 2A** (#400163897). COGCC suggests the following regarding the data XTO Energy has submitted on or attached to the Form 2A. This is informational as part of the Oil and Gas Location Assessment (OGLA) review.

1. **General Site:** The following best management practices (BMPS) are suggested:
  - BMP 5** - Operator should implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - BMP 9** - Reserve pit, or any other pit used to contain/hold fluids, if constructed, should be lined or a closed loop system (which operator has indicated on the Form 2A – Section 6. Construction) should be implemented during drilling.
  - BMP 23** - Operator should ensure 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 (at least every 14 days), and maintained in good condition.
  - BMP 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 should meet the applicable standards of table 910-1.
  - BMP 25** - Flowback and stimulation fluids should be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks should be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused should be constructed to be sufficiently impervious to contain any spilled or released material.
  - BMP 58** - Berms or other containment devices should be constructed to be sufficiently impervious to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC has suggested these BMPs to the Form 2A permit based on the OGLA review. Since this well is Southern Ute Indian Tribe, XTO Energy does not need to reply, as these will only be listed as suggested BMPs on the permit. 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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