

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, April 24, 2012 8:22 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Kinder Morgan COA's; Kinder Morgan CO2 CO LP, HE 6 Pad, Tract 38 Sec 1 T37N R19W, Montezuma County, Form 2A (#400224194) Review

**Categories:** Orange - Operator Correspondence

Scan No 2034311      CORRESPONDENCE      2A#400224194

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**From:** Clayton, Bob [mailto:Bob\_Clayton@kindermorgan.com]  
**Sent:** Tuesday, April 10, 2012 4:57 PM  
**To:** Kubeczko, Dave  
**Cc:** 'Carolyn Dunmire'; 'Therese Hoff'; Belanger, Paul  
**Subject:** Kinder Morgan COA's

Dave, noticing that I did not mention the actual well names in my previous email please use the same email below for concurrence on the following wells;

**Kinder Morgan CO2 CO LP, HE 6 Pad, Tract 38 Sec 1 T37N R19W, Montezuma County, Form 2A (#400224194) Review**

**Kinder Morgan CO2 CO LP, HB 6 Pad, NWNE Sec 36 T38N R19W, Montezuma County, Form 2A (#400224190) Review**

**Kinder Morgan CO2 Co. L.P.YA 7 Pad, SWSE Sec 13 T37N R18W, Montezuma County, Form 2A (#400224219) Review**

As you will see I deleted my request for Fly Ash information from the email as I received the information earlier today from Karen Spray.

Thanks, Bob Clayton

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**From:** Clayton, Bob  
**Sent:** Tuesday, April 10, 2012 8:07 AM  
**To:** 'Kubeczko, Dave'  
**Cc:** 'Carolyn Dunmire'; 'Therese Hoff'; Belanger, Paul  
**Subject:** Kinder Morgan COA's

Good morning Dave, First off I wanted to let you know that Kinder Morgan, without hesitation, accepts the COA's attached to our current 2A's and pit permits. I can see they are the standard COA's and have now basically become our SOP's for pad construction and drilling operations.

Thanks Dave,  
Bob Clayton  
Operations Superintendent  
Kinder Morgan CO2 Co.  
970-799-1103

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**From:** Kubeczko, Dave

**Sent:** Monday, March 26, 2012 2:39 PM

**To:** 'dunmire@ecosphere-services.com'

**Subject:** Kinder Morgan CO2 CO LP, HE 6 Pad, Tract 38 Sec 1 T37N R19W, Montezuma County, Form 2A (#400224194) Review

Carolyn,

I have been reviewing the HE 6 Pad **Form 2A** (#400224194). 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 H<sub>2</sub>S in this area, the following condition of approval (COA) will also apply:
  - COA 49** - All personnel must be H<sub>2</sub>S trained and proper air monitoring for H<sub>2</sub>S must be implemented during drilling, completion, and production operations. Emergency response plan for H<sub>2</sub>S 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. In addition, could Kinder Morgan provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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