



State  
of  
Colorado

Kubeczko - DNR, Dave <dave.kubeczko@state.co.us>

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## Koch Exploration Company LLC, AHU Wyatt 25-43 SWD Pad, SWSE Sec 25 T2N R97W, Rio Blanco County\_Form 2A#400283742 Review

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Kubeczko - DNR, Dave <dave.kubeczko@state.co.us>  
To: Dave Kubeczko - DNR <dave.kubeczko@state.co.us>

Mon, Apr 8, 2013 at 11:27 AM

Scan No 2106557      CORRESPONDENCE      2A#400283742

----- Forwarded message -----

From: Naeve, Natalie <Natalie.Naeve@kochind.com>

Date: Mon, Apr 8, 2013 at 11:16 AM

Subject: Re: Fwd: Koch Exploration Company LLC, AHU Wyatt 25-43 SWD Pad, SWSE Sec 25 T2N R97W, Rio Blanco County\_Form 2A#400283742 Review

To: "dave.kubeczko@state.co.us" <dave.kubeczko@state.co.us>

Dave,

Koch has gone over the COAs and agree to the requirements. We concur with the COAs as written. Thank you for the clarification on COA 51.

Thanks!

Natalie Naeve

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**From:** Kubeczko - DNR, Dave [mailto:dave.kubeczko@state.co.us]

**Sent:** Thursday, March 28, 2013 04:12 PM Central Standard Time

**To:** Naeve, Natalie

**Subject:** Fwd: Koch Exploration Company LLC, AHU Wyatt 25-43 SWD Pad, SWSE Sec 25 T2N R97W, Rio Blanco County\_Form 2A#400283742 Review

Natalie,

I have been reviewing the AHU Wyatt 25-43 SWD Pad **Form 2A** (#400283742). COGCC would like to attach the following conditions of approval (COAs) based on the information and data EnCana has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**General Site:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**COA 48** - Operator must submit an as-built drawing (plan view and cross-sections) of the SWD injection well pad and associated equipment within 30 calendar days of construction.

**COA 5** - Operator must implement best management practices to contain any unintentional release of

fluids, including any fluids conveyed via temporary surface or buried pipelines.

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as described on the BMPs tab and shown on the Construction Layout Drawings attachment); 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.

**COA 38** - The moisture content of any freshwater generated 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, if the drill cuttings are to be left onsite, they must also meet the applicable standards of table 910-1.

**COA 25** - If the well is to be hydraulically stimulated, flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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.

**COA 46** - Operator will use qualified containment devices for all appropriate chemicals/hazardous materials used onsite during the operation of the injection well.

**COA 41** - All tanks and aboveground vessels containing fluids must have secondary containment structures. All secondary containment structures/areas must be lined. Operator must ensure a minimum of 110 percent secondary containment for the largest structure containing fluids within each bermed area the facility during operations. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

**COA 51** - Operator shall equip and maintain on all tanks an electronic level monitoring device.

**COA 52** - Operator shall install a steel containment ring around tank batteries to provide secondary containment and install a synthetic liner that underlies the entire battery and is keyed into the top of the containment ring.

**COA 2** - Approval of this Form 2A does not authorize operator the right to inject. Authorization to inject into the selected Formation(s) requires approval of both the Form 31 and the Form 33.

**COA 22** - Before hydraulic stimulation of the each well, operator shall collect a groundwater sample from the Ohio Creek and analyze for total dissolved solids (TDS); submit laboratory analytical results to [denise.onyskiw@state.co.us](mailto:denise.onyskiw@state.co.us) and [arthur.koelspell@state.co.us](mailto:arthur.koelspell@state.co.us).

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**

Colorado Oil & Gas Conservation Commission

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