

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Friday, September 20, 2013 2:42 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: XTO Energy Inc., Huber Culhane 2-32 Pad, SWNE Sec 32 T35N R8W, La Plata County, Form 2A #400175149 Review

**Categories:** Operator Correspondence

**Scan No 2106753      CORRESPONDENCE      2A#400175149**

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**From:** Kardos, Kelly [mailto:[Kelly\\_Kardos@xtoenergy.com](mailto:Kelly_Kardos@xtoenergy.com)]  
**Sent:** Monday, September 16, 2013 12:06 PM  
**To:** [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)  
**Subject:** XTO Energy Inc., Huber Culhane 2-32 Pad, SWNE Sec 32 T35N R8W, La Plata County, Form 2A #400175149 Review

Dave,  
XTO concurs with the below COAs

Kelly K. Kardos  
Permitting Supervisor  
XTO ENERGY a subsidiary of ExxonMobil  
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Cherylene,

I have been reviewing the Huber Culhane 2-32 Pad **Form 2A** (#400175149). COGCC would like to attach the following conditions of approval (COAs) based on the data XTO Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**General:** 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 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 23** - Operator must ensure secondary containment for any volume of fluids (excluding freshwater, unless stored in a large volume aboveground storage tank [LVT]), contained at well site during drilling and completion operations (as shown on the Proposed BMPs 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 drill cuttings in a cuttings trench, area, 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 onsite, they must also meet the applicable standards of table 910-1.

**COA 25** - If the wells are to be hydraulically stimulated, 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, 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 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

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**  
**Western Colorado**

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