

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, November 17, 2014 4:51 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Koch Exploration Company LLC, WRD Unit 62N96W/29 NWSW Pad, NWSW Sec 29 T2N R96W, Rio Blanco County\_Form 2A#400711228 Review

**Categories:** Operator Correspondence

**Scan No 2107153      CORRESPONDENCE      2A#400711228**

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**From:** Todd Spivey [mailto:[tspivey@epgaz.com](mailto:tspivey@epgaz.com)]  
**Sent:** Monday, November 17, 2014 2:45 PM  
**To:** Dave Kubeczko - DNR  
**Cc:** [sarah.freeman@state.co.us](mailto:sarah.freeman@state.co.us); Howard, Douglas  
**Subject:** RE: Koch Exploration Company LLC, WRD Unit 62N96W/29 NWSW Pad, NWSW Sec 29 T2N R96W, Rio Blanco County\_Form 2A#400711228 Review

Dave,

Thank you for the clarification on COA 45 regarding the pressure testing applying to only the new pipeline/flowline from the WRD Federal 30-34. Dave Howard and I have reviewed the COA's and will agree to the COGCC terms in your email dated November 17, 2014 at 1:09pm MST.

Thank you for reviewing the permits and I will follow up with you on the Form 42 as soon as we get it completed.

Have a good day.

Todd

**Todd Spivey** | Senior Wildlife Biologist - Project Manager | Environmental, Health, and Safety Manager

720.556.7781 **C** | 303.217.4493 **D** | 303.217.9111 **F**

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**From:** Todd Spivey  
**Sent:** Monday, November 17, 2014 1:52 PM  
**To:** 'Dave Kubeczko - DNR'  
**Cc:** '[sarah.freeman@state.co.us](mailto:sarah.freeman@state.co.us)'; Howard, Douglas  
**Subject:** RE: Koch Exploration Company LLC, WRD Unit 62N96W/29 NWSW Pad, NWSW Sec 29 T2N R96W, Rio Blanco County\_Form 2A#400711228 Review

Dave,

I am reviewing the COA's with Doug Howard and will get back to you very soon. I would expect to have comments back to you before 5pm today.

Thanks

**Todd Spivey** | Senior Wildlife Biologist - Project Manager | Environmental, Health, and Safety Manager

720.556.7781 **C** | 303.217.4493 **D** | 303.217.9111 **F**

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

**Sent:** Monday, November 17, 2014 1:09 PM

**To:** Todd Spivey

**Subject:** Koch Exploration Company LLC, WRD Unit 62N96W/29 NWSW Pad, NWSW Sec 29 T2N R96W, Rio Blanco County\_Form 2A#400711228 Review

Todd,

I have been reviewing the WRD Unit 62N96W/29 NWSW Pad **Form 2A** #400711228. COGCC would like to attach the following conditions of approval (COAs) based on the information and data Koch Exploration Company LLC (Koch) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following condition of approval (COA) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad reconstruction/regarding (if necessary), rig mobilization, spud, pipeline testing, start of hydraulic stimulation operations, and start of flowback operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations). Since Koch has already built this pad, timing of notifications for pad reconstruction and rig mobilization do not need to be adhered to. Any additional wells (if drilled in the future) will need to follow the notification timelines in the future.

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

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well pad site during operations; including, but not limited to, construction/reconstruction 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 after precipitation events), and maintained in good condition.

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

**COA 76** - Strategically apply fugitive dust control measures, including encouraging established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

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

**Drilling/Completions:** The following conditions of approval (COAs) will apply:

**COA 38** - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. After drilling and completion operations have been

completed, the drill cuttings that will remain on the well pad location (cuttings management area, the cut portion of the pad, cuttings trench, dry cuttings drilling pit), must meet the applicable standards of Table 910-1. After the drill cuttings have been amended (if necessary) and placed on the well pad, sampling frequency of the drill cuttings (to be determined by the operator) shall be representative of the material left on location. No offsite disposal of cuttings to another oil and gas location shall occur without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying disposal location and waste characterization method. Commercial disposal of drill cuttings will only require notification to COGCC via a Form 4 Sundry Notice.

**COA 25** - If the well(s) is(are) 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 or storage vessel 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 constructed to be sufficiently impervious to contain any spilled or released material.

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to the Form 2A Permit if any temporary surface or buried permanent pipelines (poly or steel) are used during operations at the well pad location or nearby well pads:

**COA 45** - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. In addition, could Koch provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location when you receive them. 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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