



September 19, 2016

Colorado Oil & Gas Conservation Commission
ATTN: Director Matthew Lepore & Deputy Director Dave Kulmann
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Kinder Morgan CO2 Company, L.P.
Supplemental Disclosure - Rule 523.e – Voluntary Self-Disclosure

Dear Director Lepore and Deputy Director Kulmann,

Kinder Morgan CO₂ Company, L.P. ("Kinder Morgan") (Operator No. 46685) hereby makes this supplemental disclosure per Kinder Morgan's internal investigation for additional gas analyses, as defined within the August 26, 2016 Rule 523.e voluntary disclosure, which identified that low levels of H₂S were not submitted to the Colorado Oil & Gas Conservation Commission ("Commission" or "COGCC") pursuant to Rule 607.c, as clarified in the Commission's April 12, 2012 Notice to Operators on reporting H₂S. Kinder Morgan has been in communication with Mr. Ellsworth from your team and he has been very helpful in determining the appropriate next steps. Part of the information below, is provided to answer questions asked by Mr. Ellsworth.

As outlined within Kinder Morgan's H₂S Operations Plan, and as part of Kinder Morgan's well integrity inspection program, trained Kinder Morgan personnel monitor and record the H₂S content of CO₂ production wells by single-use colorimetric gas detection tubes under the following conditions:

- Standard Tubing Completions: Tubing/casing annulus is monitored and documented monthly. If abnormal pressures are identified, the Operations Supervisor or Operations Manager is notified, and trained KM personnel will attempt to relieve the pressure from the tubing/casing annulus to confirm if there is a tubing or casing leak. This procedure requires monitoring and recording any levels of H₂S by means of colorimetric gas detection tube. If >10 ppm H₂S is detected, venting operations will be stopped and further action reviewed by operations management.
- Tubing-Less Completions: These wells do not have a tubing/casing annulus to monitor pressure for indications of casing leaks. Monthly gas analysis of the production stream for H₂S is performed by means of colorimetric gas detection tube. H₂S levels >10 ppm are immediately reported to the Operations Supervisor or Operations Manager, and the results of this analysis are documented. If abnormal levels of H₂S are identified in the product stream, the well will be shut in and further action reviewed by operations management.

The data collected during the monthly well integrity inspections was reviewed for applicability to Rule 607.c, attached as Exhibit A and made a part hereto. As a result, three wells at Doe Canyon indicate >20 ppm H₂S and will be verified by a subsequent sampling of the source gas by laboratory gas analysis per the Commission's April 13, 2012 Notice to Operators on Reporting H₂S. In addition, there appear to be discrepancies in the H₂S concentrations reported in the August 26, 2016 Rule 523.e voluntary disclosure. These gas streams will be resampled by means of colorimetric gas detection tubes and laboratory



analysis utilizing stainless gas sample tubes and lined gas sample tubes to verify compatibility and consistency of sampling methodology, and to ensure the accuracy of the H₂S concentrations being reported to the Commission and local governmental designee. To be thorough, Kinder Morgan will also conduct follow up sampling and analysis of gas samples from the production stream at each of the tubing completions at McElmo Dome which are indicated in grey shading in Exhibit A. Kinder Morgan reserves the right to supplement this disclosure once that additional sampling is complete. Additionally, if H₂S is identified in the analytical laboratory reports for either McElmo Dome or Doe Canyon, Kinder Morgan will submit the required Sundry Notices including the information outlined in the Commission's April 13, 2012 Notice to Operators, by November 18, 2016.

Kinder Morgan is committed to compliance with all Commission Rules and Regulations, and encourages your office to contact me at 970-882-5545 or barry_swift@kindermorgan.com at any time to discuss the issues outlined in this letter. Thank you for your immediate consideration of the items outlined in this letter.

Sincerely,

A handwritten signature in black ink that reads "Barry K. Swift". The signature is written in a cursive, flowing style.

Barry K. Swift
Asset Manager

cc: Stuart Ellsworth, COGCC
Jessica Toll, KM
Ken Havens, KM
Jamie Conway, KM
Jost Energy Law, P.C.



Exhibit A

**N/A indicative of temporarily abandoned wells or tubing completions with zero backside pressure; therefore, no gas analysis is available.*

Doe Canyon

Well	Test Date	Completion	H ₂ S
Doe Canyon			
DC2	9/13/2016	Casing	15 ppm
DC3	9/13/2016	TA	N/A
DC4	9/13/2016	Casing	11 ppm
DC6	9/13/2016	Casing	10 ppm
DC8	9/13/2016	Casing	0 ppm
DC9	9/13/2016	Tubing	8 ppm
DC10	9/13/2016	Tubing	5 ppm
DC11	9/13/2016	Casing	25 ppm
DC12	9/9/2016	Casing	21 ppm
DC13	9/9/2016	Casing	30 ppm
DC14	9/13/2016	Casing	3 ppm
DC15	9/13/2016	Casing	18 ppm
DC17	9/9/2016	Casing	18 ppm
DC18	9/13/2016	Casing	10 ppm

McElmo Dome

Well	Test Date	Completion	H ₂ S
Cow Canyon			
CA6	9/3/2016	Casing	0 ppm
CB1	9/3/2016	Tubing	N/A
CB3	9/3/2016	Casing	0 ppm
CC3	9/4/2016	Casing	0 ppm
CC4	9/3/2016	Tubing	N/A
CC6	9/4/2016	Tubing	N/A
CX7	9/4/2016	Casing	0 ppm
CD4	9/4/2016	Casing	0 ppm
CD5	9/4/2016	Casing	0 ppm
Hovenweep			
HA1	8/22/2016	Tubing	N/A
HA2	8/22/2016	Casing	0 ppm
HA3	8/22/2016	Casing	0 ppm

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CO₂ COMPANY, L.P.

HA4	8/22/2016	Casing	0 ppm
HA5	8/22/2016	Casing	0 ppm
HA6	8/22/2016	Casing	0 ppm
HB1	8/18/2016	Tubing	N/A
HB2	8/18/2016	Tubing	N/A
HB3	8/18/2016	Tubing	N/A
HB5	8/18/2016	Casing	0 ppm
HB6	8/18/2016	Casing	0 ppm
HC1	8/19/2016	Tubing	N/A
HC2	8/19/2016	Tubing	0 ppm
HC3	8/19/2016	Tubing	N/A
HC4	8/19/2016	Casing	0 ppm
HD1	8/19/2016	TA	0 ppm
HWD2	8/19/2016	Tubing	0 ppm
HD3	8/19/2016	Casing	0 ppm
HE1	8/17/2016	Tubing	N/A
HE2	8/17/2016	Tubing	0 ppm
HE3	8/17/2016	Tubing	N/A
HE5	8/17/2016	Casing	0 ppm
HE6	8/17/2016	Casing	0 ppm
HF1	8/17/2016	Tubing	0 ppm
HF3	8/17/2016	Casing	NONE

Yellow Jacket

YG1	8/30/2016	Casing	0 ppm
YG2	8/30/2016	Casing	0 ppm
YA2	8/30/2016	Tubing	N/A
YA3	8/30/2016	Tubing	N/A
YA4	8/30/2016	Casing	0 ppm
YA5	8/30/2016	Casing	0 ppm
YA6	8/30/2016	Casing	0 ppm
YA7	8/30/2016	Casing	0 ppm
YA8	8/30/2016	Casing	0 ppm
YB1	8/30/2016	Tubing	0 ppm
YB2	8/30/2016	Tubing	N/A
YB3	8/30/2016	Tubing	N/A
YB4	8/30/2016	Casing	0 ppm
YB5	8/30/2016	Casing	0 ppm
YB6	8/30/2016	Casing	0 ppm
YC1	8/30/2016	Tubing	0 ppm
YC2	8/30/2016	Tubing	0 ppm
YC4	8/30/2016	Casing	0 ppm



YD 1	8/30/2016	Casing	0 ppm
YD2	8/30/2016	Tubing	0 ppm
YD3	8/30/2016	Tubing	0 ppm
YD4	8/30/2016	Casing	0 ppm
YE1	8/29/2016	Tubing	N/A
YE2	8/29/2016	Casing	0 ppm
YE6	8/29/2016	Casing	0 ppm
YE7	8/29/2016	Tubing	N/A
YF1	8/29/2016	Tubing	0 ppm
YF2	8/29/2016	Casing	0 ppm
YF3	8/29/2016	Casing	0 ppm

Moqui

MC-1	9/1/2016	Tubing	N/A
MC-3	9/1/2016	Tubing	N/A
MC-4	9/1/2016	Tubing	N/A
MC-5	9/1/2016	Tubing	N/A
MC-7	9/1/2016	Tubing	N/A
MC-8	9/1/2016	Casing	0 ppm

Goodman Point

GP9	8/2/2016	Casing	0 ppm
GP11	8/2/2016	Casing	0 ppm
GP12	8/2/2016	Casing	0 ppm
GP13	8/2/2016	Casing	0 ppm
GP14	8/2/2016	Casing	0 ppm
GP15	8/2/2016	Casing	0 ppm
GP16	8/2/2016	Casing	0 ppm
GP17	8/2/2016	Casing	0 ppm
GP19	8/2/2016	Casing	0 ppm
GP20	8/3/2016	Tubing	0 ppm
GP21	8/3/2016	Tubing	0 ppm
GP22	8/3/2016	Tubing	0 ppm
GP23	8/3/2016	Tubing	0 ppm
GP25	8/3/2016	Tubing	0 ppm
GP26	8/2/2016	Casing	0 ppm
GP27	8/2/2016	Casing	0 ppm

Sand Canyon

SC3	8/14/2016	Tubing	N/A
SC4	8/14/2016	Tubing	0 ppm
SC5	8/14/2016	TA	0 ppm
SC6	8/14/2016	Tubing	N/A



SC7	8/14/2016	Tubing	N/A
SC8	8/14/2016	Tubing	N/A
SC9	8/14/2016	Casing	0 ppm
SC10	8/14/2016	Casing	0 ppm
SC11	8/14/2016	Casing	0 ppm