

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, April 11, 2018 2:33 PM
To: Dave Kubeczko - DNR
Subject: Kinder Morgan CO2 CO LP, CB 4 Pad, Lot 13 Sec 10 T38N R19W, Montezuma County, Form 2A#401584382 Review

Categories: Operator Correspondence

Scan No. 2108447 CORRESPONDENCE 2A #401584382

From: Lopez, Christopher [mailto:Christopher.Lopez@kindermorgan.com]
Sent: Wednesday, April 04, 2018 2:11 PM
To: Dave Kubeczko - DNR
Subject: RE: Kinder Morgan CO2 CO LP, CB 4 Pad, Lot 13 Sec 10 T38N R19W, Montezuma County, Form 2A#401584382 Review

Looks good to me, thanks Dave!

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Wednesday, April 04, 2018 1:44 PM
To: Lopez, Christopher
Subject: Kinder Morgan CO2 CO LP, CB 4 Pad, Lot 13 Sec 10 T38N R19W, Montezuma County, Form 2A#401584382 Review

[This email message was received from the Internet and came from outside of Kinder Morgan]

Chris,

I have been reviewing the Kinder Morgan CO2 CO LP (Kinder Morgan), CB 4 Pad **Form 2A #401584382**. COGCC would like to attach the following conditions of approval (COAs) based on the information and data Kinder Morgan has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following conditions of approval (COAs) will apply:

COA 91 - In addition to the notifications required by COGCC listed in **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to pipeline testing (flowline from wellhead to take away pipeline) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

COA 49 - All personnel must be H₂S trained and proper air monitoring for H₂S must be implemented during drilling, completion, and production operations. Emergency response plan for H₂S must be onsite at all times.

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

COA 76 - Strategically apply fugitive dust control measures to reduce fugitive dust and coating of vegetation and deposition in water sources. Operator shall employ practices for control of fugitive dust caused by other operations, including, but not limited to the use of speed restrictions, regular road maintenance, restriction of construction and/or grading activities during high wind days. Additional management practices (road surfacing, wind breaks and barriers) may be used.

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

COA 11 - The moisture content of water/bentonite based mud (WBM) generated drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

COA 12 - A closed loop system must be implemented during drilling (as indicated on the Form 2 and Form 2A). The moisture content of all salt-based mud (SBM) drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. All cuttings generated during drilling with salt-based mud- must be segregated from water/bentonite based mud-generated drill cuttings and placed separately on the well pad. All SBM-generated drill cuttings must be kept in tanks/containers, or placed on a lined/bermed portion of the well pad; prior to disposition. The operator has indicated that 'Cuttings Disposal' will be "OFFSITE" and that the 'Cuttings Disposal Method' will be "COMMERCIAL DISPOSAL" (as shown in the 'DRILLING WASTE MANAGEMENT PROGRAM SECTION' of the Form 2A). All liners associated with salt-based drilling mud and SBM-generated drill cuttings must be disposed of offsite per CDPHE rules and regulations. Any changes to drill cuttings management and disposal at this location will require submittal of a Form 4 Sundry Notice detailing the changes.

Material Handling and Spill Prevention: The following condition of approval (COA) will apply:

COA 45 - Operator shall pressure test pipelines (flowline from wellhead to offsite separators and tanks) 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, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance.

Based on the information provided in the Form 2A by Kinder Morgan, COGCC will attach these COAs to the Form 2A permit; Kinder Morgan does not need to respond, unless you have questions or concerns with details in this email. 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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