

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Monday, April 20, 2015 12:48 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: Resend: XTO Energy Inc, North Piceance 197-15A1, NWSE Sec 15 T1S R97W, Rio Blanco County, Form 2A#400781590 Review  
**Attachments:** NP 197-15A ADDENDUM (04-15-15).pdf; NP 197-15A PRODUCTION (04-15-15).pdf  
**Categories:** Operator Correspondence

**Scan No 2107337      CORRESPONDENCE      2A#400781590**

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**From:** Kardos, Kelly [mailto:[Kelly\\_Kardos@xtoenergy.com](mailto:Kelly_Kardos@xtoenergy.com)]  
**Sent:** Thursday, April 16, 2015 8:19 AM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: Resend: XTO Energy Inc, North Piceance 197-15A1, NWSE Sec 15 T1S R97W, Rio Blanco County, Form 2A#400781590 Review

Hi Dave,

Please find attached the revised location drawing with a 500' buffer. The production facility diagram has the distances from production facilities to nearest cultural features.

XTO concurs with the proposed COAs listed below. Please let me know if you have any questions or need additional information. Thank you ☺

Kelly K. Kardos  
Permitting Supervisor  
XTO ENERGY a subsidiary of ExxonMobil  
PO Box 6501 | Englewood, CO 80155  
9127 South Jamaica St. | Englewood, CO 80112  
Office: 303.397.3727 | Cell: 505.787.7784 | Fax: 1.505.213.0546

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Tuesday, March 31, 2015 2:06 PM  
**To:** Kardos, Kelly  
**Subject:** Resend: XTO Energy Inc, North Piceance 197-15A1, NWSE Sec 15 T1S R97W, Rio Blanco County, Form 2A#400781590 Review  
**Importance:** High

Kelly,

I have resent the email sent to you on 03-19-15. 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



Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
796 Megan Avenue, Suite 201  
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FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us) | [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

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**From:** Kardos, Kelly [mailto:[Kelly\\_Kardos@xtoenergy.com](mailto:Kelly_Kardos@xtoenergy.com)]  
**Sent:** Thursday, March 19, 2015 2:36 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** Out of Office: XTO Energy Inc, North Piceance 197-15A1, NWSE Sec 15 T1S R97W, Rio Blanco County, Form 2A#400781590 Review

I will be on vacation 3/18, 3/19 & 3/20. Please contact Dee Johnson @ 505-333-3164 if you need immediate regulatory assistance or Malia Villers @ 303-397-3670 for permitting assistance.

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, March 19, 2015 2:36 PM  
**To:** [kelly\\_kardos@xtoenergy.com](mailto:kelly_kardos@xtoenergy.com)  
**Subject:** XTO Energy Inc, North Piceance 197-15A1, NWSE Sec 15 T1S R97W, Rio Blanco County, Form 2A#400781590 Review

Kelly,

I have been reviewing the North Piceance 197-15A1 Pad **Form 2A** (#400781590). The Location Drawing needs to show a 500' buffer around the edge of disturbance (current one shows a 400' buffer). In addition, the distances to cultural features section has the same distances from the well and the production facilities. These cannot be the same number and therefore, COGCC needs revised distances from the production facilities. COGCC would like to attach the following conditions of approval (COAs) based on the information and data EE3 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 construction, rig mobilization, spud, pipeline testing, start of hydraulic stimulation operations, start of flowback operations (if different than hydraulic stimulation operations), and pipeline testing using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

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

**COA 23** - Operator must ensure secondary containment for any volume of fluids 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 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 [per CDPHE requirements] and after significant precipitation events), and maintained in good condition.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) 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.

**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 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 condition of approval (COA) will apply:

**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. 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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