

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, February 15, 2010 12:55 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Davies GU A 2, SWNE Sec 13 T33N R10W, La Plata County, Form 2A (#2585330) Review

Scan No 2032838 CORRESPONDENCE 2A#2585330

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Tuesday, February 09, 2010 7:31 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Davies GU A 2, SWNE Sec 13 T33N R10W, La Plata County, Form 2A (#2585330) Review

Dave,

BP concurs with attaching the following COA's to the Form 2A permit for the Davies GU A #2:

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 50 feet. Form 2A also indicates the depth to groundwater to be 20 feet bgs for a well located 869 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 51469-F-Guyer, domestic well) approximately 608 feet to the north. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet), with shallow groundwater (i.e., less than 20 feet bgs), and/or within 1/8 of a mile (660 feet) of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water and a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
 - COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
 - COA 8** - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

Please let me know if you have questions or need further information.

Thank you,

Susan J Folk
Infill Permitting Coordinator
San Juan Coalbed Methane Infill Project
(970) 335-3828 (Office)
Susan.Folk@bp.com

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, February 03, 2010 3:14 PM
To: Folk, Susan J
Subject: BP America Prod Co, Davies GU A 2, SWNE Sec 13 T33N R10W, La Plata County, Form 2A (#2585330) Review

Susan,

I have been reviewing the Davies GU A 2 **Form 2A** (#2585330). COGCC requests the following clarifications regarding the data BP America has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 50 feet. Form 2A also indicates the depth to groundwater to be 20 feet bgs for a well located 869 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 51469-F-Guyer, domestic well) approximately 608 feet to the north. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet), with shallow groundwater (i.e., less than 20 feet bgs), and/or within 1/8 of a mile (660 feet) of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:

COA 4 - Location is in a sensitive area because of proximity to surface water and a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

COA 7 - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

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) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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