

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, March 18, 2010 2:58 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Neleigh GU 01-07 4, SWSE Sec 7 T34N R7W, La Plata County, Form 2A (#2095892) Review

Scan No 2032967 CORRESPONDENCE 2A#2095892

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Monday, March 08, 2010 2:14 PM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Neleigh GU 01-07 4, SWSE Sec 7 T34N R7W, La Plata County, Form 2A (#2095892) Review

Dave,

Please make changes to Water Resources detailed below.

BP concurs with attaching the following COA's:

COA 4 - Location is in a sensitive area because of proximity to surface water; 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 shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

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

Thank you,

Susan

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: Thursday, March 04, 2010 1:17 PM
To: Folk, Susan J
Subject: BP America Prod Co, Neleigh GU 01-07 4, SWSE Sec 7 T34N R7W, La Plata County, Form 2A (#2095892) Review

Susan,

I have been reviewing the Neleigh GU 01-07 4 **Form 2A** (#2095892). 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.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 299 feet. Form 2A also indicates the depth to groundwater to be 100 feet bgs for a well located 1118 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 232474-Neleigh, domestic well) located to the south-southeast, with a total depth of 406 feet bgs, a depth to groundwater of 30 feet bgs, and a pumping rate of 1.75 gpm. I believe this is the well you located. I can make the change if you send an email with this request. Based on the shallow depth to groundwater, as well as the permeable nature of the surface materials, COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) and with shallow groundwater (i.e., less than 20 feet bgs) 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; 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 shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

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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