

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, March 24, 2010 12:30 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Morrison Hubert GU A 4, SENW Sec 17 T34N R6W, La Plata County, Form 2A (#2096356) Review
Attachments: MORRISON_HUBERT_GUA Plat wBHL.ZIP

Scan No 2033002 CORRESPONDENCE 2A#2096356

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Monday, March 22, 2010 10:18 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Morrison Hubert GU A 4, SENW Sec 17 T34N R6W, La Plata County, Form 2A (#2096356) Review

Good Morning Dave,

Please see attached copy of Well Location Plat submitted with Form 2 showing the well location in the SENW of Sec 17, T34N, R86.

BP concurs with attaching the following COA's to the Form 2A permit:

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 may be in a sensitive area because of shallow groundwater (23' bgs); therefore either a lined drilling pit or closed loop system must be implemented.

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

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: Monday, March 15, 2010 6:00 PM
To: Folk, Susan J
Subject: BP America Prod Co, Morrison Hubert GU A 4, SENW Sec 17 T34N R6W, La Plata County, Form 2A (#2096356) Review

Susan,

I have been reviewing the Morrison Hubert GU A 4 **Form 2A** (#2096356). 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 (OGLA).

1. **Location Identification (Section 4):** Form 2A indicates the QuarterQuarter to be SENW, however, the COGCC online GIS map indicates that the lines are skewed, and therefore, the QuarterQuarter should be SWNW. If you concur, I can make the change if you send me an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 11 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) 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.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 23 feet bgs for a well located 1979 feet from the proposed well. COGCC guidelines require designating all locations with shallow groundwater (i.e., less than 20 feet bgs) a **sensitive area**. The following condition of approval (COA) will apply:
 - COA 7** - Location may be in a sensitive area because of shallow groundwater (23' bgs); 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. The other issue is minor, but also needs to be addressed. 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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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