

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 11:20 AM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Phillips GU A 3R, NWSE Sec 33 T34N R9W, La Plata County, Form 2A (#2557019) Review

Scan No 2033153 CORRESPONDENCE 2A#2557019

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Monday, May 03, 2010 7:50 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Phillips GU A 3R, NWSE Sec 33 T34N R9W, La Plata County, Form 2A (#2557019) Review

Dave,

BP concurs with attaching the following COA's to the Form 2A permit for the Philips GU A #3R:

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.

Please let me know if you questions or require further 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: Sunday, May 02, 2010 10:18 AM
To: Folk, Susan J
Subject: BP America Prod Co, Phillips GU A 3R, NWSE Sec 33 T34N R9W, La Plata County, Form 2A (#2557019) Review

Susan,

I have been reviewing the Phillips GU A 3R **Form 2A** (#2557109). 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. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 326 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.

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

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