

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 25, 2010 11:22 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: BP America Prod Co, Morris JT GU A 4, SENE Sec 18 T34N R8W, La Plata County, Form 2A (#1698466) Review

Scan No 2033155      CORRESPONDENCE      2A#1698466

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**From:** Folk, Susan J [mailto:Susan.Folk@bp.com]  
**Sent:** Tuesday, May 25, 2010 7:51 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: BP America Prod Co, Morris JT GU A 4, SENE Sec 18 T34N R8W, La Plata County, Form 2A (#1698466) Review

Dave,

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 1** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

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

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

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

Thank you,

Susan

Susan J Folk  
*Infill Permitting Coordinator*  
*San Juan Coalbed Methane Infill Project*  
(970) 335-3828 (Office)  
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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Saturday, May 15, 2010 12:29 PM  
**To:** Folk, Susan J  
**Subject:** BP America Prod Co, Morris JT GU A 4, SENE Sec 18 T34N R8W, La Plata County, Form 2A (#1698466) Review

Susan,

I have been reviewing the Morris JT GU A 4 **Form 2A** (#1698466). 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 52 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area** (which BP has already indicated on the Form 2A). 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.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 228 feet from the proposed facility. COGCC guidelines require designating all locations with shallow groundwater (i.e., less than 20 feet bgs) and with close proximity of a domestic water well (1/8 mile or 660 feet) a **sensitive area** (which BP has already indicated on the Form 2A). The following conditions of approval (COA) will apply:
  - COA 1** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
  - COA 7** - Location may be in a sensitive area because of proximity to a domestic water well; therefore either a lined drilling pit or closed loop system must be implemented.
  - COA 8** - Location may be 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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