

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 11:26 AM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Water Transfer Station (WTS) 314, SWNE Sec 1 T33N R8W, La Plata County, Form 2A (#1698485) Review

Scan No 2033156 CORRESPONDENCE 2A#1698485

From: Dossey, Julie M (Contractor) [mailto:Julie.Dossey@bp.com]
Sent: Monday, May 24, 2010 9:31 AM
To: Kubeczko, Dave
Cc: King, Samuel P
Subject: RE: BP America Prod Co, Water Transfer Station (WTS) 314, SWNE Sec 1 T33N R8W, La Plata County, Form 2A (#1698485) Review

Dave,

See the note below, concurring that BP will comply with the COGCC's COA's for the Form 2A for BP's Water Transfer station.
I submitted a hard copy of the Form and attachments, do I need to forward these comments to the Denver office?

Thanks
Julie

BP will comply with the COAs and provide Colorado PE oversight to "The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent",.
Regards,

Sam King, PE
BP Facility Engineer - Base Water
Office: 970.247.6855
Cell: 970.769.4809
Durango, CO

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, May 19, 2010 1:18 PM
To: Dossey, Julie M (Contractor)
Subject: FW: BP America Prod Co, Water Transfer Station (WTS) 314, SWNE Sec 1 T33N R8W, La Plata County, Form 2A (#1698485) Review

Julie,

Please see my revised review below (it should make more sense now). Thanks.

Dave

Julie,

I have been reviewing the Water Transfer Station (WTS) 314 **Form 2A** (#1698485). 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 488 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 site during 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 7 feet bgs for a well located 590 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 8 - Location is in a sensitive area because of shallow groundwater and proximity to a domestic water well; therefore, liners must be used where above ground fluid containing/fluid transferring structures are present.
3. **General:** The following conditions of approval (COAs) will also apply:
COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at the facility during operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
COA 41 - All secondary containment structures/areas must be lined. The construction and lining of the secondary containment structures/areas shall be supervised by a professional engineer or their agent.

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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