

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, August 09, 2010 3:41 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Clary GU 4, SWSE Sec 18 T34N R9W, La Plata County, Form 2A (#400076352) Review

Scan No 2033281 CORRESPONDENCE 2A#400076352

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Tuesday, July 27, 2010 1:24 PM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Clary GU 4, SWSE Sec 18 T34N R9W, La Plata County, Form 2A (#400076352) Review

Dave,

BP concurs with attaching the following COA's to the Form 2 A permit for the Clary GU #4:

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 of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore production pits must be lined.

Please let me know if you have questions or require 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, July 26, 2010 1:38 PM
To: Folk, Susan J
Subject: BP America Prod Co, Clary GU 4, SWSE Sec 18 T34N R9W, La Plata County, Form 2A (#400076352) Review

Susan,

I have been reviewing the Clary GU 4 **Form 2A** (#400076352). 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 230 feet. COGCC guidelines require designating all locations within close proximity to surface water 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 24 feet bgs for a well located 538 feet from the proposed well pad. COGCC guidelines require designating all locations with close proximity of a domestic water well (1/8 mile or 660 feet) and shallow groundwater a **sensitive area** (which BP has already indicated on the Form 2A). The following conditions of approval (COA) will apply:

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

COA 8 - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; 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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