

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, August 24, 2010 4:54 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Clary GU 3, SWSW Sec 18 T34N R9W, La Plata County, Form 2A (#400081263) Review

Scan No 2033318 CORRESPONDENCE 2A#400081263

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Thursday, August 12, 2010 3:37 PM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Clary GU 3, SWSW Sec 18 T34N R9W, La Plata County, Form 2A (#400081263) Review

Dave,

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

COA 4 - Location is in a sensitive area because of proximity to surface water (irrigation ditch and Animas River to east-northeast); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures sufficiently protective of nearby surface water.

COA 5 - Operator must implement best management practices to contain any unintentional release of drilling, completion, or produced fluids.

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

Thank you,

Susan

Susan J Folk
Infill Project 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: Thursday, August 12, 2010 10:26 AM
To: Folk, Susan J
Subject: BP America Prod Co, Clary GU 3, SWSW Sec 18 T34N R9W, La Plata County, Form 2A (#400081263) Review

Susan,

I have been reviewing the Clary GU 3 **Form 2A** (#400081263). 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 227 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 (irrigation ditch and Animas River to east-northeast); therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures sufficiently protective of nearby surface water.
COA 5 - Operator must implement best management practices to contain any unintentional release of drilling, completion, or produced fluids.

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) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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