

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Friday, January 07, 2011 11:13 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: BP America Prod Co, DeKay GU A 4, NENE Sec 23 T33N R8W, La Plata County, Form 2A (#400114023) Review

Scan No 2033571      CORRESPONDENCE      2A#400114023

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**From:** Folk, Susan J [<mailto:Susan.Folk@bp.com>]  
**Sent:** Wednesday, January 05, 2011 1:46 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: BP America Prod Co, DeKay GU A 4, NENE Sec 23 T33N R8W, La Plata County, Form 2A (#400114023) Review

Good Afternoon Dave,

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

**COA 6** - Reserve pit (if constructed) must be lined or closed loop system (which BP has indicated on the Form 2A) must be implemented during drilling. Any other pit constructed (frac pit) must be lined.

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

**COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of Table 910-1, the the , with the following exceptions where applicable: COGCC and CDPHE have decided that operators do not need to request variances from CDPHE for instances where pit contents do not meet the Table 910-1 values for pH, electrical conductivity (EC), or sodium adsorption ration (SAR). However, operators shall attempt, where practicable, to meet the pH, EC, and SAR values, but must ensure that the remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with the 1000 Series Rules. The backfill and replaced soil must meet Table 910-1 pH, EC, and SAR values, with consideration given to background levels in native soils.

Please give me a call if you need additional information.

Thank you,

Susan

Susan J Folk  
*Infill Project Permitting Coordinator*  
*Regulatory Compliance*  
*San Juan Coalbed Methane Infill Project*  
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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Tuesday, December 21, 2010 8:19 AM  
**To:** Folk, Susan J  
**Subject:** BP America Prod Co, DeKay GU A 4, NENE Sec 23 T33N R8W, La Plata County, Form 2A (#400114023) Review

Susan,

I have been reviewing the DeKay GU A 4 **Form 2A** (#400114023). COGCC would like to attach the following conditions of approval (COAs) based on the information BP America has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General:** The following conditions of approval (COAs) will also apply:

**COA 6** - Reserve pit (if constructed) must be lined or closed loop system (which BP has indicated on the Form 2A) must be implemented during drilling. Any other pit constructed (frac pit) must be lined.

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

**COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of Table 910-1, the the , with the following exceptions where applicable: COGCC and CDPHE have decided that operators do not need to request variances from CDPHE for instances where pit contents do not meet the Table 910-1 values for pH, electrical conductivity (EC), or sodium adsorption ration (SAR). However, operators shall attempt, where practicable, to meet the pH, EC, and SAR values, but must ensure that the remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with the 1000 Series Rules. The backfill and replaced soil must meet Table 910-1 pH, EC, and SAR values, with consideration given to background levels in native soils.

COGCC would appreciate your concurrence with attaching these COAs (item 1) 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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