

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, March 25, 2015 3:15 PM
To: dave.kubeczko@state.co.us
Subject: FW: BP America Production Company, Bonifacio Gallegos A #3 Pad, SWSE Sec 2 T33N R8W, La Plata County, Form 2A#400804603 Review

Scan No 2107321 CORRESPONDENCE 2A#400804603

From: Campbell, Patricia [mailto:Patricia.Campbell@bp.com]
Sent: Wednesday, March 25, 2015 1:56 PM
To: Dave Kubeczko - DNR
Subject: RE: BP America Production Company, Bonifacio Gallegos A #3 Pad, SWSE Sec 2 T33N R8W, La Plata County, Form 2A#400804603 Review

Mr. Kubeczko,

BP concurs with the Site Specific COAs to the Form 2A stated below.

Respectfully,

Patti Campbell
Regulatory Analyst
(970) 335-3828 (Office)
(970) 375-7529 (Fax)
patricia.campbell@bp.com

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Friday, March 20, 2015 5:56 PM
To: Campbell, Patricia
Subject: BP America Production Company, Bonifacio Gallegos A #3 Pad, SWSE Sec 2 T33N R8W, La Plata County, Form 2A#400804603 Review

Patti,

I have been reviewing the Bonifacio Gallegos A #3 Pad **Form 2A** (#400804603). COGCC would like to attach the following additional conditions of approval (COAs) based on the data BP America Production Company (BP) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following conditions of approval (COAs) will apply:

COA 91 - Notify the COGCC 48 hours prior to start of pad reconstruction/regarding (if necessary), rig mobilization, spud, start of hydraulic stimulation operations, start of flowback operations (if different than start of hydraulic stimulation operations), and pipeline testing using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

Construction: The following conditions of approval (COAs) will apply:

COA 23 - Operator must ensure 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 (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular

intervals (at least every 14 days per CDPHE requirements and after significant precipitation events), and maintained in good condition.

COA 44 - The access road will be constructed and maintained as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COA 76 - Strategically apply fugitive dust control measures, including enforcing established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) to contain any spilled or released material around permanent crude oil, condensate, and produced water storage tanks.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 38 - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

COA 25 - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material.

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply:

COA 45 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network.

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
Western Colorado



Colorado Oil & Gas Conservation Commission
Northwest Area Office
796 Megan Avenue, Suite 201
Rifle, CO 81650
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us | www.colorado.gov/cogcc

Please consider the environment before printing this e-mail