

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Friday, March 27, 2015 5:01 PM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: BP America Production Company, Tubbs 32-6-9 A2 & B4 Pad, SWNE Sec 9 T32N R6W, La Plata County, Form 2A#400792720 Review  
**Attachments:** Tubbs 32-6-9 A 2 & B 4 -Waste Management Plan.pdf  
**Categories:** Operator Correspondence

Scan No 2107325      CORRESPONDENCE      2A#400792720

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**From:** Campbell, Patricia [mailto:[Patricia.Campbell@bp.com](mailto:Patricia.Campbell@bp.com)]  
**Sent:** Thursday, March 26, 2015 2:53 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** RE: BP America Production Company, Tubbs 32-6-9 A2 & B4 Pad, SWNE Sec 9 T32N R6W, La Plata County, Form 2A#400792720 Review

Hi Dave,

BP will not be burying the cuttings but will be hauling cuttings to a certified Commercial disposal site per the 2A (the same as the Bonifacio Gallegos A 3).

I have attached the required Waste Management Plan for the Tubbs site.

Thank you for your guidance with this.

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

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Thursday, March 19, 2015 5:21 PM  
**To:** Campbell, Patricia  
**Subject:** BP America Production Company, Tubbs 32-6-9 A2 & B4 Pad, SWNE Sec 9 T32N R6W, La Plata County, Form 2A#400792720 Review

Patti,

I have been reviewing the Tubbs 32-6-9 A2 & B4 Pad **Form 2A** (#400792720). Since this location is in a Buffer Zone, a Waste Management Plan is required per Rule 303.b.(3).J.ii. (see below). 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.

**Rule 303.b.(3).J.iii:**

**303. REQUIREMENTS FOR FORM 2, APPLICATION FOR PERMIT-TO-DRILL, DEEPEN, RE-ENTER, OR RECOMPLETE, AND OPERATE; FORM 2A, OIL AND GAS LOCATION ASSESSMENT.**

**b. FORM 2A, OIL AND GAS LOCATION ASSESSMENT.**

**(3) Information Requirements.** The Form 2A requires the attachment of the following information. Where the information required under this section has been included in a federal Surface Use Plan of Operations meeting

the requirements of Onshore Oil and Gas Order Number 1 (72 Fed. Reg. 10308 (March 7, 2007)), or for a federal Right of Way, Form 299, then the operator may attach the completed pertinent information and identify on the Form 2A where the information required under this section may be found therein.

J. If the proposed Oil and Gas Location is within one thousand (1,000) feet of a Building Unit

- i. **Facility Layout Drawing.** A scaled facility layout drawing depicting the location of all existing and proposed new Oil and Gas Facilities listed on the Form 2A;
- ii. **Waste Management Plan.** A Waste Management Plan describing how the Operator intends to satisfy the general requirements of Rule 907.a.; and
- iii. **Rule 305.a.(2) Certification.** Evidence that Building Unit owners within the Buffer Zone received the pre-application notice required by Rule 305.a.(2).

**BP needs to provide COGCC with a Waste Management Plan.**

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

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, 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 37** - Lighting abatement measures beyond the requirements of Rule 803. shall be implemented, including the following, at a minimum: (1) rig oriented to direct light away from nearby residents; and (2) install lighting shield devices on all of the more conspicuous lights.

**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.

Operator shall also adhere to the BMPs listed on the Operator BMP/COA Tab as well as to the following rule.:

**Rule 604.c.(2). A. thru W.:**

#### **604. SETBACK AND MITIGATION MEASURES FOR OIL AND GAS FACILITIES, DRILLING, AND WELL SERVICING OPERATIONS**

c. **Mitigation Measures.** The following requirements apply to an Oil and Gas Location within a Designated Setback Location and such requirements shall be incorporated into the Form 2A or associated Form 2 as Conditions of Approval.

(2) **Location Specific Requirements – Designated Setback Locations.** Subject to Rule 502.b., the following mitigation measures shall apply to any Well or Production Facility proposed to be located within a Designated Setback Location for which a Form 2 Application for Permit to Drill or Form 2A Oil and Gas Location Assessment is submitted on or after August 1, 2013: In particular:

**C. Green Completions - Emission Control Systems.**

**F. Leak Detection Plan.**

**M. Fencing requirements (if required by surface owner).**

**N. Control of fire hazards.**

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



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