

FORM  
2A

Rev  
08/13

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

400792720

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Date Received:

02/25/2015

Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: \_\_\_\_\_

Submit signed original form. This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:  
**441327**  
Expiration Date:  
**03/29/2018**

This location assessment is included as part of a permit application.

CONSULTATION

- This location is included in a Comprehensive Drilling Plan. CDP # \_\_\_\_\_
- This location is in a sensitive wildlife habitat area.
- This location is in a wildlife restricted surface occupancy area.
- This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 10000  
Name: BP AMERICA PRODUCTION COMPANY  
Address: 501 WESTLAKE PARK BLVD  
City: HOUSTON State: TX Zip: 77079

Contact Information

Name: Patti Campbell  
Phone: (970) 335-3823  
Fax: (970) 375-7529  
email: patricia.campbell@bp.com

RECLAMATION FINANCIAL ASSURANCE

- Plugging and Abandonment Bond Surety ID: 20010158     Gas Facility Surety ID: \_\_\_\_\_
- Waste Management Surety ID: \_\_\_\_\_

LOCATION IDENTIFICATION

Name: Tubbs 32-6-9 Number: A2 & B4  
County: LA PLATA  
Quarter: SWNE Section: 9 Township: 32N Range: 6W Meridian: N Ground Elevation: 6347

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 2478 feet FNL from North or South section line  
2240 feet FEL from East or West section line  
Latitude: 37.032289 Longitude: -107.504307  
PDOP Reading: 1.7 Date of Measurement: 10/09/2014  
Instrument Operator's Name: Drew Nelson

## RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:

LOCATION ID # FORM 2A DOC #

## FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	<u>2</u>	Oil Tanks*	<u>    </u>	Condensate Tanks*	<u>    </u>	Water Tanks*	<u>1</u>	Buried Produced Water Vaults*	<u>    </u>
Drilling Pits	<u>    </u>	Production Pits*	<u>    </u>	Special Purpose Pits	<u>    </u>	Multi-Well Pits*	<u>    </u>	Modular Large Volume Tanks	<u>    </u>
Pump Jacks	<u>2</u>	Separators*	<u>2</u>	Injection Pumps*	<u>    </u>	Cavity Pumps*	<u>    </u>	Gas Compressors*	<u>    </u>
Gas or Diesel Motors*	<u>2</u>	Electric Motors	<u>2</u>	Electric Generators*	<u>    </u>	Fuel Tanks*	<u>    </u>	LACT Unit*	<u>    </u>
Dehydrator Units*	<u>    </u>	Vapor Recovery Unit*	<u>    </u>	VOC Combustor*	<u>    </u>	Flare*	<u>    </u>	Pigging Station*	<u>    </u>

## OTHER FACILITIES\*

Other Facility Type

Number

Electric Control Box

1

\*Those facilities indicated by an asterisk (\*) shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

Per well, up to 4 steel flowlines a maximum of 4" in diameter from the wellhead to the separator skid  
A 3 inch diameter steel line from the below grade tank to the main water gathering line  
A 4 inch diameter steel line from the separator to the main gas gathering line

## CONSTRUCTION

Date planned to commence construction: 04/28/2015 Size of disturbed area during construction in acres: 1.54

Estimated date that interim reclamation will begin: 04/28/2016 Size of location after interim reclamation in acres: 1.09

Estimated post-construction ground elevation: 6348

## DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H<sub>2</sub>S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: ONSITE Drilling Fluids Disposal Method: Recycle/reuse

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?     

Reuse Facility ID:      or Document Number:     

Centralized E&P Waste Management Facility ID, if applicable:     

## SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Alfred Serna Phone: 970-883-2355

Address: 3338 CR 330 Fax: \_\_\_\_\_

Address: \_\_\_\_\_ Email: \_\_\_\_\_

City: Ignacio State: CO Zip: 81137

Surface Owner:  Fee  State  Federal  Indian

Check all that apply. The Surface Owner:  is the mineral owner  
 is committed to an oil and Gas Lease  
 has signed the Oil and Gas Lease  
 is the applicant

The Mineral Owner beneath this Oil and Gas Location is:  Fee  State  Federal  Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: \_\_\_\_\_ Surface Surety ID: \_\_\_\_\_

Date of Rule 306 surface owner consultation 11/04/2014

### CURRENT AND FUTURE LAND USE

#### Current Land Use (Check all that apply):

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe): Pinyon/Juniper shrub land

Subdivided:  Industrial  Commercial  Residential

#### Future Land Use (Check all that apply):

Crop Land:  Irrigated  Dry land  Improved Pasture  Hay Meadow  CRP

Non-Crop Land:  Rangeland  Timber  Recreational  Other (describe): Pinyon/Juniper shrub land

Subdivided:  Industrial  Commercial  Residential

**CULTURAL DISTANCE INFORMATION**

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	<b>From WELL</b>	<b>From PRODUCTION FACILITY</b>
Building:	923 Feet	938 Feet
Building Unit:	923 Feet	938 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	660 Feet	746 Feet
Above Ground Utility:	715 Feet	800 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	154 Feet	262 Feet

**INSTRUCTIONS:**

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, and Designated Outside Activity Area - as defined in 100-Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(\*) on the Facilities Tab.

**DESIGNATED SETBACK LOCATION INFORMATION**

- Check all that apply. This location is within a:
- Buffer Zone
  - Exception Zone
  - Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: \_\_\_\_\_  
 Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 01/02/2015

**FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:**

- Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*
- By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

BP acquired the SUA for the Tubbs 32-6-9 A2 prior to Rule 604(b)2 implementation in 2013. The Tubbs 32-6-9 B4 was added to the site due to constraints on the B2 pad.

**SOIL**

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 81 - Zyme clay loam, 3 to 25 percent slopes  
 NRCS Map Unit Name: \_\_\_\_\_  
 NRCS Map Unit Name: \_\_\_\_\_

## PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes  No

Plant species from:  NRCS or,  field observation Date of observation: 02/09/2015

List individual species: Pinon and juniper trees; smooth brome

### Check all plant communities that exist in the disturbed area.

- Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)  
 Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)  
 Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)  
 Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)  
 Mountain Riparian (Cottonwood, Willow, Blue Spruce)  
 Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)  
 Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)  
 Alpine (above timberline)  
 Other (describe): \_\_\_\_\_

## WATER RESOURCES

Is this a sensitive area:  No  Yes

Distance to nearest

downgradient surface water feature: 1140 Feet

water well: 271 Feet

Estimated depth to ground water at Oil and Gas Location 34 Feet

Basis for depth to groundwater and sensitive area determination:

Area is determined to be sensitive due to the proximity of surface water.

Is the location in a riparian area:  No  Yes

Was an Army Corps of Engineers Section 404 permit filed  No  Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: \_\_\_\_\_

## GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 608

## DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  
 Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  
 Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  
 Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  
 Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

**RULE 502.b VARIANCE REQUEST**

Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number \_\_\_\_\_

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

**OPERATOR COMMENTS AND SUBMITTAL**

Comments    The SUA for this location was acquired prior to the Buffer Zone setback rule.  
DPW consultation is via the BP San Juan Colorado Wildlife Mitigation Plan (WMP) dated March 2011.  
The SUAs attached to the related Form 2's contains a waiver to the 30 day notice (Rule 305) and consultation (Rule 306).  
Reference area photos will be provided at a later date during the growing season.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: \_\_\_\_\_ Date: 02/25/2015 Email: patricia.campbell@bp.com

Print Name: Patti Campbell Title: Regulatory Analyst

Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:  Director of COGCC Date: 3/30/2015

**Conditions Of Approval**

**All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.**

<b>COA Type</b>	<b>Description</b>
	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.
	<p>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.</p> <p>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.</p> <p>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.</p> <p>Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.</p>
	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
	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).

## Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Community Outreach and Notification	A business located across the highway and out of site of the wellpad falls in the 1000' buffer zone. Notification was sent to the building owner on 1/2/15 with the offer of a meeting with BP (attached). No meeting was requested. Notification of the 2A submittal and comment period will be sent upon completion check.
2	Traffic control	Access will be via an access road off of the County Road . Access to the wellsite is granted by the SUA and road ROWs from adjacent landowners. BP will comply with any La Plata County and/or CDOT traffic control measures as required.
3	Storm Water/Erosion Control	Covered in the Field Wide Storm Water Management Plan. Site specific SWMPs have been developed for this location and include the use of wattles and rock rundowns where needed as shown on the attached drawings.
4	Dust control	The access road will be graveled to control dust.
5	Noise mitigation	Noise levels will be monitored by the operator and will meet the COGCC standards. In order to meet the COGCC standards, BP will implement measures such as mufflers or sound walls, if necessary.
6	Interim Reclamation	Wattles will be repaired or replaced as necessary following interim reclamation. Re-seeding will be done as soon as possible following reclamation of the pad with weed free straw mulch. BP will tackify or crimp mulch to the exposed soil surfaces.  Noxious weeds are not significant at this site. Noxious weeds are controlled by an ongoing weed control plan.

Total: 6 comment(s)

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2107325	CORRESPONDENCE
2107326	WASTE MANAGEMENT PLAN
2519718	SURFACE AGRMT/SURETY
400792720	FORM 2A SUBMITTED
400793443	LOCATION PICTURES
400794839	LOCATION PICTURES
400794849	HYDROLOGY MAP
400794865	ACCESS ROAD MAP
400794872	NRCS MAP UNIT DESC
400794875	LOCATION DRAWING
400794880	MULTI-WELL PLAN
400794913	OTHER
400798600	FACILITY LAYOUT DRAWING
400798672	CONST. LAYOUT DRAWINGS
400798714	CONST. LAYOUT DRAWINGS
400798716	REFERENCE AREA MAP

Total Attach: 16 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Final Review Completed. No LGD or public comment received.	3/30/2015 7:53:00 AM
OGLA	Initiated/Completed OGLA Form 2A review on 03-06-15 by Dave Kubeczko, requested acknowledgement of notification, fluid containment, spill/release BMPs, flowback to tanks, odor control, cuttings low moisture content, lighting mitigation, pipeline testing, and tank berming COAs from operator on 3-06-15; received acknowledgement of COAs from operator on 03-26-15; passed by CPW on 03-11-15 with operator WMP BMPs acceptable; passed OGLA Form 2A review on 03-27-15 by Dave Kubeczko; notification, fluid containment, spill/release BMPs, flowback to tanks, odor control, cuttings low moisture content, lighting mitigation, pipeline testing, and tank berming COAs.	3/19/2015 4:35:52 PM
DOW	The Operator has agreed to incorporate this well into BPs existing San Juan Basin Colorado Wildlife Mitigation Plan (dated March 2011). The well will be subject to the BMPs specified in the Plan, including pre-construction biological surveys, compliance with raptor nest guidelines, and screening of planned day rig activity for conflicts with known eagle nests and roosts prior to commencing rig work. In addition, any new surface disturbance associated with this well pad, access road, and gathering pipeline will be incorporated into Tables 1 and 2 of the Plan and mitigated off-site per the standards identified in the plan.	3/11/2015 3:31:04 PM
Permit	Attached SUA since its the right to construct on location.	3/4/2015 7:12:45 AM
Permit	Passed Completeness	2/27/2015 10:28:38 AM
OGLA	Passed Buffer Zone completeness review	2/26/2015 2:04:27 PM
Permit	Within buffer zone, sent on to OGLA for further review.	2/26/2015 7:29:23 AM

Total: 7 comment(s)