

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, November 18, 2015 11:42 AM
To: dave.kubeczko@state.co.us
Subject: BP America Production Company, Arthur Jones A 3 Pad, SWNW Sec 26 T33N R7W, La Plata County, Form 2A#400908067 Review

Categories: Operator Correspondence

Scan No 2107703

OPERATOR CORRESPONDENCE

2A#400908067

From: Campbell, Patricia [mailto:Patricia.Campbell@bp.com]
Sent: Wednesday, November 18, 2015 10:29 AM
To: Dave Kubeczko - DNR
Subject: RE: BP America Production Company, Arthur Jones A 3 Pad, SWNW Sec 26 T33N R7W, La Plata County, Form 2A#400908067 Review

Hi Dave,

BP has reviewed the COA below and concurs with them. BP's Rule 306.e. certification letter to follow.

Thank you,

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: Wednesday, November 04, 2015 8:18 AM
To: Campbell, Patricia
Subject: BP America Production Company, Arthur Jones A 3 Pad, SWNW Sec 26 T33N R7W, La Plata County, Form 2A#400908067 Review

Patti,

I have been reviewing the Arthur Jones A 3 Pad **Form 2A #400908067**. COGCC requests that BP America Production Company (BP) submit evidence/certification that it has complied with the requirements of **Rule 306.e. once the Public/LGD Comment Period has passed**. COGCC would like to attach the following additional conditions of approval (COAs) based on the data BP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following condition of approval (COA) will apply:

COA 91 - In addition to the notifications required by COGCC listed in the Northwest Notification Policy and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to rig mobilization and pipeline testing (flowlines from wellheads to separators to tanks; and/or any temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

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

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations (as shown on the Proposed BMPs attachment); 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 fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals as required by CDPHE (at least every 14 days and after precipitation events), and maintained in good condition. The design/build of any perimeter berm shall be sized, constructed, and compacted sufficiently to contain fluids during drilling operations, as well as all fluids contained in temporary frac tanks during completion operations.

COA 44 - The access road will be 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 encouraging 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 or equivalent protection) to contain any spilled or released material around permanent 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 or storage vessel 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 condition of approval (COA) will apply:

COA 45 - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) 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



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