



**Christopher L. Sandoz**

Regulatory Engineer – L48 West BU

BP America Production Company  
737 North Eldridge Pkwy.  
Houston, TX 77079

Direct: 713-323-3520  
Email: christopher.sandoz@bp.com

November 30, 2015

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

**Attention: Mr. Matt Lepore, Director**

**Re: Vacuum Pumps on Wells (Rule 331) - Multiple Wells (see attached)  
Ignacio Blanco Field - La Plata County, Colorado**

Dear Mr. Lepore:

Pursuant to Rule 331 (Vacuum Pumps on Wells), BP America Production Company (BP) respectfully requests approval to impose a vacuum on the referenced Fruitland Coal wells in order to access additional reserves.

The vacuum will be achieved by modifying existing compressors already located on the wellsites. Oxygen analyzers will be installed for monitoring purposes in order to minimize the introduction of air to the system.

In support of this request, we have prepared exhibits showing all wells located within ½ mile radius of the subject wells. Only one non-BP operated well was identified which is currently producing from the Fruitland Coal within ½ mile radius of our subject wells. The Conoco Phillips - Bondad 33-10 No. 105 (05-067-08299) well is located within ½ mile of our Davies A 1 well and our Elmer Dunkel A 1 well. As a result, BP is notifying Conoco Phillips Company of our proposal by copy of this letter via certified mail.

Should you have questions or require additional information, please contact me at (713) 323-3520 or christopher.sandoz@bp.com.

Sincerely,

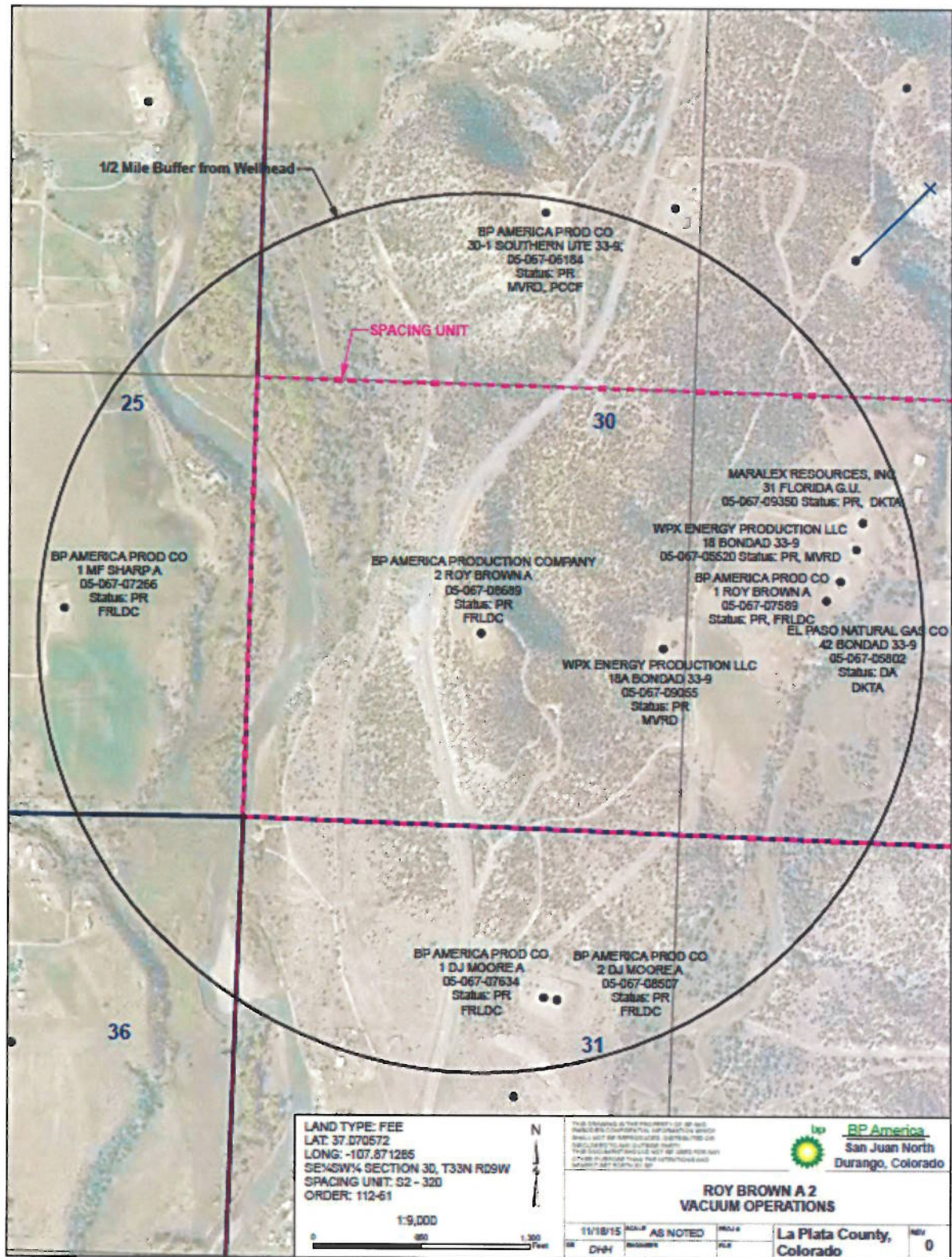
Christopher L. Sandoz  
Regulatory Engineer – San Juan

cc: Brienne Olson Stahnke Patti Campbell  
Conoco Phillips Company, P.O. Box 2197, Houston TX, 77252-2197, Attn: Lori Notor

**Exhibit 1 – List of Wells**

<b>Well Name</b>	<b>API</b>	<b>Location</b>	<b>Spacing Unit</b>	<b>Order</b>
Roy Brown A 2	05-067-08689	SESW Sec 30, T33N, R9W	S2 - 320	112-157
Alva Short A 2	05-067-08425	SESW Sec 7, T33N, R9W	S2 - 320	112-157
Davies A 1	05-067-07265	NENW Sec 13, T33N, R10W	N2 - 320	112-61
Elmer Dunkel A 1	05-067-07455	NWSE Sec 12, T33N, R10W	E2 - 320	112-61

November 30, 2015 - C. Sandoz to M. Lepore (COGCC) - Rule 331 Request  
**Exhibit 2 – Maps**





November 30, 2015 - C. Sandoz to M. Lepore (COGCC) - Rule 331 Request  
**Exhibit 2 – Maps**

