

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:

401229683

Date Received:

03/16/2017

Oil and Gas Location Assessment

New Location     Refile     Amend Existing Location    Location#: 325843

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:

**325843**

Expiration Date:

**04/28/2020**

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: 380 AIRPORT RD  
 City: DURANGO    State: CO    Zip: 81303

Contact Information

Name: Naomi Azulai  
 Phone: (970) 3757511  
 Fax: ( )  
 email: naomi.azulai@bp.com

RECLAMATION FINANCIAL ASSURANCE

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

LOCATION IDENTIFICATION

Name: LEE FEDERAL    Number: 1  
 County: LA PLATA  
 Quarter: NWSE    Section: 3    Township: 34N    Range: 6W    Meridian: N    Ground Elevation: 7279

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: 1555 feet FSL from North or South section line  
1389 feet FEL from East or West section line

Latitude: 37.240124    Longitude: -107.510746

PDOP Reading: 1.6    Date of Measurement: 10/10/2016

Instrument Operator's Name: BRIAN BONIFACE

## 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>1</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>1</u>	Separators*	<u>1</u>	Injection Pumps*	<u>    </u>	Cavity Pumps*	<u>    </u>	Gas Compressors*	<u>    </u>
Gas or Diesel Motors*	<u>1</u>	Electric Motors	<u>    </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

RTU & Solar Panel	<u>1</u>
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\*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:

On pad: 3" diameter fiberglass (FG) pipeline for gas, 3" diameter fiberglass (FG) pipeline for water from wellhead to separator to water tank. 4" to 6" diameter steel gas pipeline offsite.  
There will be no changes to existing facilities on the pad.

## CONSTRUCTION

Date planned to commence construction: 05/12/2017 Size of disturbed area during construction in acres: 1.06  
Estimated date that interim reclamation will begin: 09/12/2017 Size of location after interim reclamation in acres: 0.60  
Estimated post-construction ground elevation: 7279

## 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? Yes

Will oil based drilling fluids be used? No

## DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE 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: Carolyn Lee

Phone: 9702471145

Address: 889 CR 234

Fax: \_\_\_\_\_

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

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

City: Durango State: CO Zip: 81301

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: oil and gas lease

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

Date of Rule 306 surface owner consultation \_\_\_\_\_

## 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): Private Forest 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): Private Forest 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:	5088 Feet	5131 Feet
Building Unit:	5088 Feet	5131 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	3314 Feet	3254 Feet
Above Ground Utility:	5280 Feet	5280 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	78 Feet	25 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.
- Large UMA Facility - 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: \_\_\_\_\_

**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.

**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: Soil Surveys not available for this township. \_\_\_\_\_

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: 11/01/2016

List individual species:

**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: 32 Feet

water well: 855 Feet

Estimated depth to ground water at Oil and Gas Location 65 Feet

Basis for depth to groundwater and sensitive area determination:

Sensitive area due to close downgradient surface water feature. Groundwater level based on closest domestic use water well determined by using data provided on GOGCC GIS.

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

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

Is the Location within a Floodplain?  No  Yes Floodplain Data Sources Reviewed (check all that apply)

Federal (FEMA)

State

County

Local

Other  Field Observation

**GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING**

Water well sampling required per Rule 608

**WILDLIFE**

This location is included in a Wildlife Mitigation Plan

This location was subject to a pre-consultation meeting with CPW held on \_\_\_\_\_

### DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

- Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area
- 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

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

Signed: \_\_\_\_\_ Date: 03/16/2017 Email: naomi.azulai@bp.com

Print Name: Naomi Azulai Title: Well Permitting 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: 4/29/2017

### 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.**

#### COA Type

#### Description

<u>COA Type</u>	<u>Description</u>
	In addition to the notifications required by 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.

	<p>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.</p> <p>Based on the recent onsite (04-11-17) conducted by COGCC, additional stormwater controls will be required for the existing well pad area of this oil and gas location.</p> <p>The access road will be maintained as to not allow 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 encouraging established speed limits on private and Forest Service 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 or equivalent protection) to contain any spilled or released material around permanent produced water storage tanks.</p>
	<p>A closed loop system must be implemented during drilling (as indicated on the Form 2 and Form 2A). The moisture content of all drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts. All cuttings generated during drilling with salt-based mud (SBM) must be segregated from water/bentonite based mud-(WBM-) generated drill cuttings and placed separately on the well pad. All SBM-generated drill cuttings must be kept in tanks/containers, or placed on a lined/bermed portion of the well pad; prior to disposition. The operator has indicated that 'Cuttings Disposal' will be "OFFSITE" and that the 'Cuttings Disposal Method' will be "COMMERCIAL DISPOSAL" (as shown in the 'DRILLING WASTE MANAGEMENT PROGRAM SECTION' of the Form 2A). All liners associated with salt-based drilling mud and SBM-generated drill cuttings must be disposed of offsite per CDPHE rules and regulations. Any changes to drill cuttings management and disposal at this location will require submittal (via a Form 4 Sundry Notice) and approval of a Waste Management Plan detailing the changes (specifying cuttings characterization methods, cuttings management, amendment, and onsite disposal location[s]).</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 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.</p> <p>Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.</p>
	<p>Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; pipelines from onsite separators to offsite storage 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, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance.</p>

## Best Management Practices

<u>No</u>	<u>BMP/COA Type</u>	<u>Description</u>
1	Wildlife	This well pad is covered in the San Juan Basin Wildlife Mitigation Plan (WMP) dated March 2011. The WMP is currently in a renewal process and an amendment/extension is anticipated 6/2017.
2	Storm Water/Erosion Control	Covered in the Field Wide Storm Water management Plan. Site specific SWMPs have been developed as reflected in the construction and reclamation SWMP BMP drawings attached.
3	Emissions mitigation	Green Completions – Emission Control Systems (604.c.(2).C). Since this is a coal well, there will not be a typical “flowback” period. Instead, the subject well will be swabbed into tanks and connected to the production facility. Venting and/or flaring would only occur in an upset condition.
4	Drilling/Completion Operations	Noise: Equipment will be placed on location to mitigate noise; hospital grade mufflers will be used as necessary.  Light: Light plants facing away from residences and facing the ground.

Total: 4 comment(s)

## Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2108118	FOREST SERVICE WAIVER OF SETBACK REQUIREMENTS
2108119	REFERENCE AREA MAP
2108120	REFERENCE AREA PICTURES
2108121	CORRESPONDENCE
401229683	FORM 2A SUBMITTED
401233395	LOCATION PICTURES
401233410	CONST. LAYOUT DRAWINGS
401233418	LOCATION DRAWING
401233419	HYDROLOGY MAP
401233420	ACCESS ROAD MAP
401233422	MULTI-WELL PLAN
401235143	PROPOSED BMPS
401235144	PROPOSED BMPS
401239109	SURFACE AGRMT/SURETY

Total Attach: 14 Files

**General Comments**

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Permit	Final Review Completed. No LGD or public comment received.	04/28/2017
Permit	Right to construct corrected to oil and gas lease to reflect Form 2 information and due to mineral estate being dominant.	04/28/2017
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. The WMP is currently in a renewal process and an amendment/extension is anticipated 6/2017.	04/18/2017
OGLA	Initiated/Completed OGLA Form 2A review on 04-12-17 by Dave Kubeczko; requested Reference Area Map and Pictures, adjacent surface owner, National Forest Service, waiver of 150-foot setback from property line for well, and acknowledgement of notification, fluid containment, spill/release BMPs, sediment and dust control access road, flowback to tanks, tank berming, odor control, cuttings low moisture/management, and pipeline testing COAs from operator on 04-12-17; received Reference Area Map and Pictures, adjacent surface owner, National Forest Service, waiver of 150-foot setback from property line for well, and acknowledgement/concurrence of COAs from operator on 04-17-17; because this oil and gas location is adjacent to National Forest Service (NFS) regulated surface, COGCC has added/marked the Rangeland Box (as this is more descriptive of what the surface is) under the 'Current and Future Land Use' Section of the Form 2A; based on review of COGCC's Online GIS Map Layer for Floodplains (FEMA 100-Year Effective [Jan 2016]. FEMA 100-Year Preliminary [July 2015], and PREVIOUS FEMA 100-Year Effective [July 2015]), COGCC has added/marked the Federal (FEMA) Box for 'Floodplain Data Sources Reviewed (check all that apply) under the 'Water Resources' Section of the Form 2A; passed by CPW on 04-18-17 with location falling within the operator's Wildlife Mitigation Plan being acceptable; passed OGLA Form 2A review on 04-27-17 by Dave Kubeczko; notification, fluid containment, spill/release BMPs, sediment and dust control access road, flowback to tanks, tank berming, odor control, cuttings low moisture/management, and pipeline testing COAs.	04/12/2017
Permit	Passed Completeness	03/21/2017
Permit	Return to Draft: Right to Construct is listed by a Surface Use Agreement; SUA attachment is required.	03/21/2017

Total: 6 comment(s)