

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, February 15, 2010 12:57 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: BP America Production Company, So. Ute 32-09; 06-02 2, NWNW Sec 6 T32N R9W, La Plata County, Form 2A (#2585480) Review

Scan No 2032839      CORRESPONDENCE      2A#2585480

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**From:** Folk, Susan J [mailto:Susan.Folk@bp.com]  
**Sent:** Tuesday, February 09, 2010 7:35 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: BP America Production Company, So. Ute 32-09; 06-02 2, NWNW Sec 6 T32N R9W, La Plata County, Form 2A (#2585480) Review

Dave,

BP concurs with attaching the following COA's to the Form 2A permit for the So. Ute 32-09; 06-02 #2:

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 238 feet and to the nearest water well is 560 feet (Permit No. 233433-Two Square LLC, domestic well, with a total depth of 200 feet bgs, a depth to groundwater of 50 feet, and a pumping rate of 8 gpm). COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) and/or within 1/8 of a mile of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
  - COA 4** - Location is in a sensitive area because of proximity to surface water and a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
  - COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
  - COA 8** - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

Please let me know if you have questions or require further information.

Thank you,

Susan J Folk  
**Infill Permitting Coordinator**  
**San Juan Coalbed Methane Infill Project**  
(970) 335-3828 (Office)  
[Susan.Folk@bp.com](mailto:Susan.Folk@bp.com)

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, January 29, 2010 3:44 PM  
**To:** Folk, Susan J  
**Subject:** BP America Production Company, So. Ute 32-09; 06-02 2, NWNW Sec 6 T32N R9W, La Plata County, Form 2A (#2585480) Review

Susan,

I have been reviewing the So. Ute 32-09; 06-02 2 **Form 2A** (#2585480). COGCC requests the following clarifications regarding the data BP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface is 238 feet and to the nearest water well is 560 feet (Permit No. 233433-Two Square LLC, domestic well, with a total depth of 200 feet bgs, a depth to groundwater of 50 feet, and a pumping rate of 8 gpm). COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) and/or within  $\frac{1}{8}$  of a mile of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:

**COA 4** - Location is in a sensitive area because of proximity to surface water and a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.

**COA 7** - Location is in a sensitive area because of proximity to a domestic water well and shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

**COA 8** - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

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) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

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