

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, March 18, 2010 2:59 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Klusman Ranches GU 3, SWSE Sec 11 T33N R8W, La Plata County, Form 2A (#2096278) Review

Scan No 2032968 CORRESPONDENCE 2A#2096278

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Wednesday, March 10, 2010 9:18 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Klusman Ranches GU 3, SWSE Sec 11 T33N R8W, La Plata County, Form 2A (#2096278) Review

Dave,

Please make the following changes per your email.

Distance to nearest water well – 2831 ft.
Depth to groundwater – 14' bgs

BP concurs with attaching the following COA's to the Form 2A permit:

COA 4 - Location is in a sensitive area because of proximity to surface water; 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 shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

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

Thank You,

Susan

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

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Friday, March 05, 2010 1:32 PM
To: Folk, Susan J
Subject: BP America Prod Co, Klusman Ranches GU 3, SWSE Sec 11 T33N R8W, La Plata County, Form 2A (#2096278) Review

Susan,

I have been reviewing the Klusman Ranches GU 3 **Form 2A** (#2096278). COGCC requests the following clarifications regarding the data BP America has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 41 feet. Form 2A also indicates the depth to groundwater to be 0 feet bgs for a well located 2676 feet from the well pad. COGCC's review indicates there is a water well (Permit No. 206293-McMillan, domestic well) located approximately 2831 feet to the north, with a total depth of 180 feet bgs, a depth to groundwater of 14 feet bgs, and a pumping rate of 2 gpm. I believe this is the well you located. I can make the change if you send an email with this request. Based on the shallow depth to groundwater, as well as the permeable nature of the surface materials, COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) and with shallow groundwater (i.e., less than 20 feet bgs) 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; 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 shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

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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