

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, March 24, 2010 1:16 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Mankins Howard GU 4, SENE Sec 10 T34N R7W, La Plata County, Form 2A (#2585687) Review

Scan No 2033004 CORRESPONDENCE 2A#2585687

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Monday, March 22, 2010 10:23 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Mankins Howard GU 4, SENE Sec 10 T34N R7W, La Plata County, Form 2A (#2585687) Review

Dave,

BP concurs with attaching the following COA's to the Form 2A permit for the Mankins Howard GU #4:

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 may be in a sensitive area because of proximity to a domestic water well; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location may be 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 any questions or need additional information.

Thank you,

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: Monday, March 15, 2010 6:01 PM
To: Folk, Susan J
Subject: BP America Prod Co, Mankins Howard GU 4, SENE Sec 10 T34N R7W, La Plata County, Form 2A (#2585687) Review

Susan,

I have been reviewing the Mankins Howard GU 4 **Form 2A** (#2585687). 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 (OGLA).

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 11 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) 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.

1. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 0 feet bgs for a well located 684 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 233412-Mankins, domestic well) approximately 758 feet to the north, with a total depth of 180 feet bgs, a depth to groundwater of 51 feet bgs, and a pumping rate of 4 gpm. I can make the changes if you send an email with this request.

Based on the close proximity of the well pad to domestic water wells, the following COAs will apply:

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

COA 8 - Location may be 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. The other issue is minor, but also needs to be addressed. 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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