

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, April 12, 2010 5:33 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Maestas GU A 3, NWSE Sec 23 T33N R9W, La Plata County, Form 2A (#2581162) Review
Attachments: MAESTAS GU A #3 REF.ZIP; Maestas GU A #3 W.JPG

Scan No 2033050 CORRESPONDENCE 2A#2581162

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Thursday, April 08, 2010 10:47 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Maestas GU A 3, NWSE Sec 23 T33N R9W, La Plata County, Form 2A (#2581162) Review

Dave,

Attached is a Reference Area Location Map for the Maestas GU A #3. As the reference area is not adjacent to the proposed pad we will be providing the 4 photos but at a later date. Since the photos should be taken during the growing season our anticipated submittal date will be in late April/May. It is our understanding that we have 12 months from application submittal to provide the photos. Please advise if this will delay application approval.

Also attached is the west Location Picture.

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 of proximity to a domestic water well; 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 any questions or need additional 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: Monday, April 05, 2010 6:55 AM
To: Folk, Susan J
Subject: FW: BP America Prod Co, Maestas GU A 3, NWSE Sec 23 T33N R9W, La Plata County, Form 2A (#2581162) Review

Susan,

I wasn't sure if you received this email (Maestas GU A 3 **Form 2A** #2581162), so I have sent it again. 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

From: Kubeczko, Dave

Sent: Tuesday, March 30, 2010 4:04 PM

To: susan.folk@bp.com

Subject: BP America Prod Co, Maestas GU A 3, NWSE Sec 23 T33N R9W, La Plata County, Form 2A (#2581162) Review

Susan,

I have been reviewing the Maestas GU A 3 **Form 2A** (#2581162). 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 435 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.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 45 feet bgs for a well located 239 feet from the proposed well. COGCC's guidelines require designating all locations within close proximity within 1/8 of a mile (660 feet) of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
 - COA 7** - Location is 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 is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.
3. **Rule 303.d.(3).A.:** The west Location Picture is missing. Can you please submit this photograph.
4. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland, commercial), a reference area needs to be indicated either on a topographic map or in the comments section if the reference area is adjacent to the proposed pad. In addition, four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (03/10/2010) unless the reference area is adjacent to the proposed pad and vegetation can be seen on the location pictures. If you can confirm that the reference area is adjacent to the pad and in what direction, I can make the change if you send an email with this request; otherwise, a reference area map and reference area photographs are required.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need 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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