

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, April 13, 2010 7:45 AM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Taylor GU 21-23 3, NENE Sec 23 T34N R8W, La Plata County, Form 2A (#2096431) Review

Scan No 2033062 CORRESPONDENCE 2A#2096431

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Thursday, April 01, 2010 8:57 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Taylor GU 21-23 3, NENE Sec 23 T34N R8W, La Plata County, Form 2A (#2096431) Review

Dave,

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 may be in a sensitive area because of shallow groundwater (23' bgs); therefore either a lined drilling pit or closed loop system must be implemented.

Please let me know if you need any 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: Tuesday, March 30, 2010 4:05 PM
To: Folk, Susan J
Subject: BP America Prod Co, Taylor GU 21-23 3, NENE Sec 23 T34N R8W, La Plata County, Form 2A (#2096431) Review

Susan,

I have been reviewing the Taylor GU 21-23 3 **Form 2A** (#2096431). 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 41 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 23 feet bgs for a well located 732 feet from the proposed well. COGCC guidelines require designating all locations with shallow groundwater (i.e., less than 20 feet bgs) a **sensitive area**. The following condition of approval (COA) will apply:
COA 7 - Location may be in a sensitive area because of shallow groundwater (23' bgs); 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

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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