

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 14, 2010 1:08 PM
To: Kubeczko, Dave
Subject: FW: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Scan No 2033370 CORRESPONDENCE 2A#400085607

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Tuesday, September 14, 2010 1:06 PM
To: Kubeczko, Dave
Subject: RE: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Dave,

Yes, we are in concurrence with the COA's for the Ray, Billy GU #3.

Thank you,

Susan

Susan J Folk
Infill Project 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, September 14, 2010 11:16 AM
To: Folk, Susan J
Subject: RE: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Susan,

Done. Are we in concurrence with the COAs for this permit?

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
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Cell: (970) 309-2514
dave.kubeczko@state.co.us



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From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Tuesday, September 14, 2010 10:16 AM
To: Kubeczko, Dave
Subject: RE: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Thank you Dave. We would also request that COA 46 be reworded to replace "prevent" with "control". Most of our stormwater bmps are specifically designed to control such things as sediment in stormwater runoff rather than preventing runoff.

Thanks,

Susan

Susan J Folk
Infill Project 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, September 14, 2010 8:27 AM
To: Folk, Susan J
Subject: FW: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Susan,

Per our conversation on Tuesday (September 14, 2010), I have reworded COAs 4 and 46 (**text is in red [bold] and highlighted**). Please review and correspond accordingly. Thanks.

Dave

From: Kubeczko, Dave
Sent: Wednesday, September 08, 2010 1:15 PM
To: susan.folk@bp.com
Subject: Resend (original sent on 08-30-10) of BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Susan,

I'm not sure if you received this email. The CDOW has passed their task today (09-08-2010) and the public comment period ends tomorrow (09-09-2010). Can you please review at your convenience. Thanks.

Dave

From: Kubeczko, Dave

Sent: Monday, August 30, 2010 9:28 AM

To: susan.folk@bp.com

Subject: BP America Prod Co, Ray, Billy GU 3, SWNW Sec 19 T34N R9W, La Plata County, Form 2A (#400085607) Review

Susan,

I have been reviewing the Ray, Billy GU 3 **Form 2A** (#400085607). 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) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 490 feet. COGCC will attach the following conditions of approval (COAs) based on the data BP America has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which BP has already indicated on the Form 2A). 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; **potential options include, but are not limited to:** construction of a berm or diversion dike **(either around the entire well pad, portions of the well pad; or around specific vessels and/or structures)**, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures sufficiently protective of nearby surface water. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - 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 120 feet bgs for a well located 161 feet from the proposed well pad. COGCC guidelines require designating all locations with close proximity of a domestic water well (1/8 mile or 660 feet) and shallow groundwater a **sensitive area** (which BP has already indicated on the Form 2A). The following conditions of approval (COA) will apply:
 - 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 and shallow groundwater; therefore production pits must be lined.
3. **General:** The following conditions of approval (COAs) will apply:
 - COA 6** – Any pit constructed to hold fluids [if constructed]) must be lined or a closed loop system (which has been indicated by BP America on the Form 2A) must be implemented during drilling.
 - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
 - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.
 - COA 46** - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and/or **any potentially impacted** stormwater runoff.

COGCC would appreciate your concurrence with attaching these COAs (Items 1, 2 and 3) 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) 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
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