

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, December 02, 2010 2:58 PM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Tinker GU 02-09 4, SWNE Sec 9 T34N R8W, La Plata County, Form 2A (#400100217) Review

Scan No 2033517 CORRESPONDENCE 2A#400100217

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Thursday, December 02, 2010 1:23 PM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Tinker GU 02-09 4, SWNE Sec 9 T34N R8W, La Plata County, Form 2A (#400100217) Review

Dave,

BP concurs with attaching the following COA's to the Form 2A for the Tinker GU 02-09 #4:

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 0 feet since an intermittent stream will be piped under the pad temporarily. 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 its 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 option 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 (i.e., BMPs associated with stormwater management) sufficiently protective of nearby surface water.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids; including any fluids conveyed by temporary surface pipelines.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 835 feet from the proposed well pad. COGCC guidelines require designating all locations with 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 the potential for shallow groundwater; therefore either a lined drilling pit or a closed loop system (which BP has already indicated on the Form 2A) must be implemented.
 - COA 8** - Location is in a sensitive area because of the potential for shallow groundwater; therefore production pits must be lined.
3. **General:** The following conditions of approval (COAs) will also apply:
 - 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, with the following exceptions where applicable: COGCC and CDPHE have decided that operators do not need to request variances from CDPHE for instances where pit contents do not meet the Table 910-1 values for pH, electrical conductivity (EC), or sodium adsorption ration (SAR). However, operators shall attempt, where practicable, to meet the pH, EC, and SAR values, but must ensure that the remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with the 1000 Series Rules. The backfill and replaced soil must meet Table 910-1 pH, EC, and SAR values, with consideration given to background levels in native soils.

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

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: Thursday, December 02, 2010 8:06 AM
To: Folk, Susan J; Hawk, Andrew G
Subject: RE: BP America Prod Co, Tinker GU 02-09 4, SWNE Sec 9 T34N R8W, La Plata County, Form 2A (#400100217) Review

Susan,

COGCC is resending COAs for the Tinker GU 02-09 4 **Form 2A** (#400100217). COGCC would appreciate your concurrence with attaching these COAs (items 1, 2, and 3) to the Form 2A permit prior to passing the Oil and Gas Location Assessment (OGLA) review. This permit is currently 48 days into the COGCC permitting process and is ready to be passed. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

From: Kubeczko, Dave
Sent: Wednesday, November 10, 2010 11:09 AM
To: Folk, Susan J; andrew.hawk@bp.com
Subject: FW: BP America Prod Co, Tinker GU 02-09 4, SWNE Sec 9 T34N R8W, La Plata County, Form 2A (#400100217) Review

Susan,

Please see the revised COAs for the Tinker GU 02-09 4 **Form 2A** (#400100217). 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. Thanks.

Dave

From: Kubeczko, Dave
Sent: Thursday, October 21, 2010 1:31 PM
To: Folk, Susan J
Subject: BP America Prod Co, Tinker GU 02-09 4, SWNE Sec 9 T34N R8W, La Plata County, Form 2A (#400100217) Review

Susan,

I have been reviewing the Tinker GU 02-09 4 **Form 2A** (#400100217). COGCC requests the following clarifications regarding the data BP America has submitted on or attached to the Form 2A. In addition, COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

4. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 0 feet since an intermittent stream will be piped under the pad temporarily. 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 its 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 option 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 (i.e., BMPs associated with stormwater management) sufficiently protective of nearby surface water.
- COA 5** - Operator must implement best management practices to contain any unintentional release of fluids; **including any fluids conveyed by temporary surface pipelines.**
5. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 30 feet bgs for a well located 835 feet from the proposed well pad. COGCC guidelines require designating all locations with 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 the potential for shallow groundwater; therefore either a lined drilling pit or a closed loop system (which BP has already indicated on the Form 2A) must be implemented.
- COA 8** - Location is in a sensitive area because of the potential for shallow groundwater; therefore production pits must be lined.
6. **General:** The following conditions of approval (COAs) will also apply:
- 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, **with the following exceptions where applicable: COGCC and CDPHE have decided that operators do not need to request variances from CDPHE for instances where pit contents do not meet the Table 910-1 values for pH, electrical conductivity (EC), or sodium adsorption ration (SAR). However, operators shall attempt, where practicable, to meet the pH, EC, and SAR values, but must ensure that the remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with the 1000 Series Rules. The backfill and replaced soil must meet Table 910-1 ph, EC, and SAR values, with consideration given to background levels in native soils.**

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
Rifle, CO 81650
Phone: (970) 625-2497x5
FAX: (970) 625-5682
Cell: (970) 309-2514
dave.kubeczko@state.co.us



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