

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, December 26, 2011 6:38 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: BP America Prod Co, Beebe, Gary GU A #2 Pad, NESW Sec 25 T34N R7W, La Plata County, Form 2A (#400229424) Review

**Categories:** Orange - Operator Correspondence

Scan No 2034103      CORRESPONDENCE      2A#400229424

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**From:** Campbell, Patricia [<mailto:Patricia.Campbell@bp.com>]  
**Sent:** Monday, December 12, 2011 3:24 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: BP America Prod Co, Beebe, Gary GU A #2 Pad, NESW Sec 25 T34N R7W, La Plata County, Form 2A (#400229424) Review

Hi Dave,

BP concurs with the COAs listed below for the Beebe, Gary GU A #2 well pad

*Patti Campbell*  
*Regulatory Analyst*  
*(970) 335-3828 (Office)*  
*(970) 335-3738 (Fax)*  
[patricia.campbell@bp.com](mailto:patricia.campbell@bp.com)

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**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, December 12, 2011 3:20 PM  
**To:** Campbell, Patricia  
**Subject:** BP America Prod Co, Beebe, Gary GU A #2 Pad, NESW Sec 25 T34N R7W, La Plata County, Form 2A (#400229424) Review

Patti,

I have been reviewing the Beebe, Gary GU A #2 Pad **Form 2A** (#400229424). COGCC would like to attach the following conditions of approval (COAs) based on the information and data BP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General:** The following conditions of approval (COAs) will apply:
  - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.
  - COA 6a** - Any pit constructed to hold liquids, must be lined or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling.
  - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids (excluding freshwater) contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.

**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 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**

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