

Agency Request for Comment Form

Pre-App Date: **May 15, 2014**
 Pre-App Planner: **Courtney Krueger**
 Parcel #: **6171-032-00-024**
 Owner: **Neil K Family Trust & Short**
 Subdiv: _____

Project Name:
 Southern Ute 32-10 4-3 Wellhead Compressor Major Oil & Gas Facility

Date: 2014-0124
 Project #: 2014-0124

House #: _____
 Project Type: **Oil & Gas - Major**

Project Planner: **Courtney Krueger**

This form must be submitted to each agency indicated on Agency Checklist. A copy of the Project's Site Plan (all pages), Project Narrative, and Vicinity map must be submitted with this form to each agency, per La Plata County Regulations. These materials must be submitted in 9x12 addressed envelopes (do not seal) to Planning Department with your project application submittal. Be sure to affix proper postage to each envelope to be mailed. Planner will mail packets after verifying contents.

Top Portion to be Completed by Applicant, Bottom Portion by Agency

Applicant:

Applicant BP America			Telephone 335-3828 (970) 382-8037
Contact Patti Campbell, Regulatory Analyst			
Email			
Address 380 Airport Road			
City Durango	State CO	ZIP 81303	

Agent:

Agency	
Agent	Work Telephone () -
Email Address	
Address	
City	State ZIP

Parcel Location:

Address	
GeoCode 6171-03	GeoCode Suffix 2

Parcel Identification:

Parcel # 6171-032-00-024	Lot #	Section 03	Township 32 N	Range 10 W	Parcel Size 640
Subdivision					

Sewer:

Is the Parcel within 400 ft. of a central sewer system?	Y/N No	Project will be served by ISDS <input type="checkbox"/> Central Sewer <input checked="" type="checkbox"/>
Sewer Company		
Address and Telephone #		

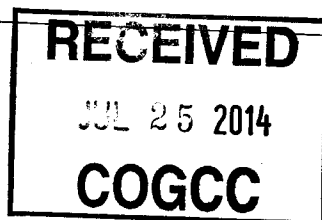
Water:

Is the Parcel within 400 ft. of a central water system?	Y/N No	Project will be served by Well <input type="checkbox"/> Central Water <input type="checkbox"/>
Water Company		
Address and Telephone #		

Project Information:

Project Description
BP proposes to permit an existing wellhead compressor located on the Southern Ute 32-10 4-3 well location.
Patti Campbell is a BP employee & authorized to permit.

Reviewing Agency
COGCC Environmental



Agency Comments:

Agency Representative (please print)	Signature
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Agency Representative:

Please return your comments within 21 days after receiving this form and package. If you need more information, please call us at 970-382-6263. Please send your comments to the Planning Department, and not directly to a planner. The project may not be assigned to the planner performing the pre-application meeting.

All comments should be sent to:

via email:

klemmwk@co.laplata.co.us (preferred method)

via regular mail:

Attn: La Plata County Planning Department
 1060 East Second Avenue
 Durango, CO 81301

BP AMERICA PRODUCTION COMPANY
EXISTING SOUTHERN UTE 32-10; 4-3 WELLHEAD COMPRESSION PROJECT
(Existing Equipment)
NE/4 NE/4 SECTION 04, T32N, R10W NMPM
(Neil K Short Trust & Shirley I Short Trust
Parcel 617103200024)

PROJECT NARRATIVE AND REVIEW CRITERIA

Background and Need:

The project location is approximately 14 miles south of Durango on Cox Canyon Road. The site is accessed from CR 213 via Rancho Durango Road and Cox Canyon.

In 1990 BP permitted the Southern Ute 32-10; 4-3 well with La Plata County, Project #1990-213. The administrative approval included the well and associated equipment (wellhead assembly, separator, water tanks and a meter house). The site was also permitted in 1990 with the COGCC, originally as a tribal site. Based on archaeological discoveries, the site was moved to its current location on fee surface. Notification was made to the COGCC regarding the change, but both the COGCC and BP records showed this as a tribal site. COGCC and BP records have been corrected to show this site as fee surface. This parcel of land is surrounded by Southern Ute tribal lands. Upon submitting a permit modification to add artificial lift for this site, BP and La Plata County discovered BP did not receive a La Plata County Major Oil and Gas Permit when a 509HP wellhead compressor was added to this site in 2000.

BP America Production Company (BP) is applying for a Major Oil & Gas Facility Permit from La Plata County to bring the existing 509HP Ajax wellhead compressor into compliance.

BP America Production Company (BP) is developing mineral interests in La Plata County Coalbed Methane (CBM). The So Ute 32-10; 4-3 well was drilled in 1990 and produced against prevailing conditions of gas gathering pipeline pressures until the Ajax compressor was added to the site in 2000. The Ajax compressor was needed because reservoir pressure dropped to a low level making it necessary to substantially reduce the surface pressure against which the well produces in order to maintain production. The well currently needs to have a beam unit with a 13 HP gas driven engine added to the well to de-water the well and optimize production. The cumulative HP will be 527 for all equipment onsite. Both the Ajax compressor and beam unit results in no new land disturbance. The facility is located on a well pad approximately 1.35 acres in size in a 640 acre tract of fee land surrounded by Southern Ute Indian tribal lands.

The following equipment exists onsite:

- One (1) Wellhead assembly
- One (1) 300 bbl tank – 12' DIA x 15' high

- One (1) Separator – 3' DIA x 10' high (enclosed in a 4' wide x 6' long x 8' high cabinet)
- One (1) 509HP Ajax single stage wellhead compressor – 12' wide x 30' long (enclosed in sound walls approximately 45' wide x 62' long x 14' high)
- One (1) fuel gas scrubber – 2' DIA x 2' long
- One (1) lube oil tank – 3' DIA x 5' long
- One (1) 95 bbl sump tank 5' DIA x 6' high
- One (1) 5HP charge pump
- One (1) meter building – 14' x 6'8" long x 7' high

Additionally, BP plans to add (1) Shores beam unit with one (1) 13HP gas driven engine to the site on a pad approximately 7' wide x 18' long. The beam unit height will be 185". The equipment is painted green, slightly darker than the adjacent landscape.

The unmanned facility is in operation twenty four hours per day and monitored remotely through BP's automation system. The system allows computers and operators at the BP Control Center, located on Airport Road, to receive data, control processes and receive alarms from the RTU located at the site.

Operation & Maintenance:

The So Ute 32-10; 4-3 site is accessed via CR 213, Rancho Durango Road and Cox Canyon Road (portions of which are Southern Ute Indian Tribe and require a SUIT crossing pass). BP has permission/easements for the access to this site. The plan to add artificial to the site will require moving a daylight rig onsite once the work is approved.

Routine operational traffic consists of BP personnel accessing the site once or twice per week for routine maintenance and inspection. Personnel arrive on the site in a passenger vehicle pickup truck.

Compressor specific maintenance includes PMs every 60 days with a crew of 1-2 passenger vehicle trucks. Annually, 4-5 passenger vehicle trucks and a crane access the site to perform annual maintenance. Coastal Chemical accesses the site twice a year to provide antifreeze for the site.

The site is equipped with automated monitoring so that any operational concerns are electronically forwarded to a twenty four hour manned monitoring system to dispatch appropriate response.

Site Characteristics and Suitability:

This existing site is located on a parcel of private land completely surrounded by Southern Ute tribal property. The site is an established well pad with no additional construction planned. As an established site, noxious weed and stormwater management practices are in place. Traffic will be minimal as mentioned above.

The So Ute 32-10; 4-3 is in an extremely remote area. The closest residence to the site is approximately 5 miles to the north. The predominate land use is for natural gas

extraction. This land is not legally accessible by the general public due to the surrounding tribal lands. Access by the individual surface owner represents the only public who may enter the area. Therefore, public impacts such as visual mitigation are minimal. Visual mitigation is accomplished through painting the equipment a uniform or camouflaging, non-contrasting, non-reflective color tone.

Currently, there is a compressor with acoustically treated barrier walls around it colored to match the surroundings. A 13HP gas driven engine is planned to be added to the site. The site complies with COGCC noise standards. The existing well site is located in an extremely remote area of La Plata County surrounded by Southern Ute Indian lands. No houses are nearby. There is no human habitation on the private parcel. The nearest residence is approximately 5 miles to the north. Between this wellsite and residence, there exists numerous tribal land compressor stations and one private land compressor station. Therefore, there is no possibility of this site impacting the distant residences in terms of noise.

This facility is not a major source of air emissions and will not require a permit after the installation of the artificial lift engine. The wellhead compressor engine utilizes lean burn technology which minimizes the emissions of nitrogen oxides. The artificial lift engine will be a small certified engine that meets the emission limits in EPA's New Source Performance Standard for Spark Ignition Internal Combustion Engines in Subpart JJJJ of Part 40 of the Code of Federal Regulations.

Surface water quality from stormwater discharge is not anticipated to be an issue since the existing site is not being modified and no ground disturbance will take place. The site currently has stormwater BMPs in place. There is a diversion berm that starts northwest of the entrance and directs water around the pad to an outlet off of location to the southwest corner of the pad. This location is covered under BP's Field Wide Stormwater Management Plan with the CDPHE. The existing road will not be modified.

There is no construction or ground disturbance associated with this site so impacts on wildlife will be minimal.

As mentioned above, general public access to this site is not allowed. This site is surrounded by Southern Ute Indian tribal lands requiring passing permits for access. Access by the individual surface owner represents the only public access to the area.

Adequacy of existing roads and access to the site

The So Ute 32-10; 4-3 facility is located on a well-traveled oil and gas road network.

The access to the So Ute 32-10; 4-3 site off Cox Canyon road provides adequate sight distances and allows for safe ingress and egress.

The average traffic volumes for this site will be low. Typically, BP personnel visit the site once or twice a week for inspection and routine maintenance in a passenger vehicle.

BP is a member of the La Plata Energy Council and is the dedicated Road Manager for Rancho Durango and Cox Canyon roads. As the Road Manager, BP voluntarily maintains the road and works with area landowners to address road maintenance issues. (Please see attached Road Maintenance narrative)

BP has legal access via individual agreements and So Ute crossing permits to provide ingress and egress to the So Ute 32-10; 4-3 well site.

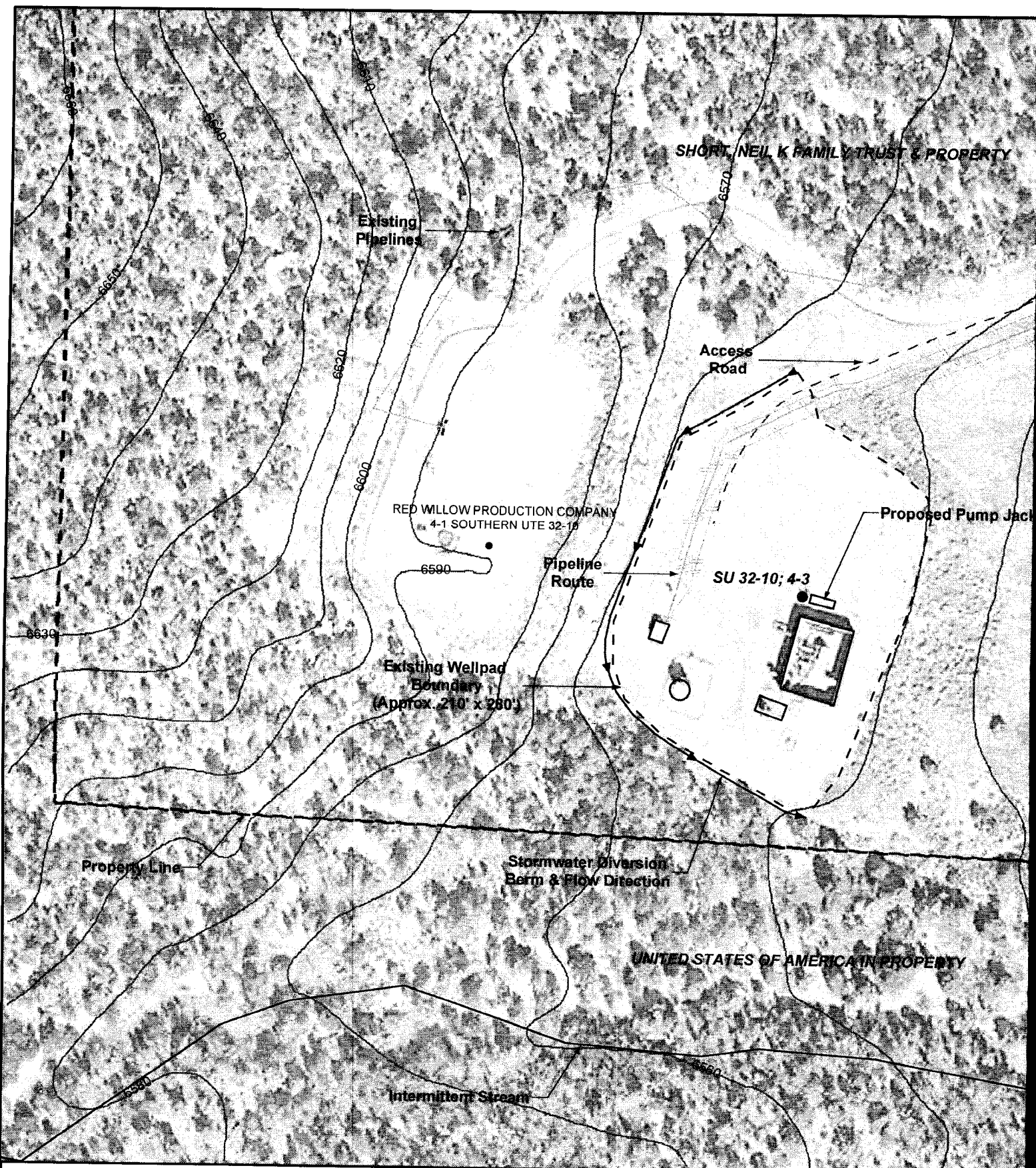
Compatibility:

This site is in a remote area that is predominately oil and gas production. All parcels adjacent to the site are Southern Ute Indian Tribe. No residents are in close vicinity. Traffic impacts will be associated with routine inspections and maintenance once or twice a week and annual maintenance for the wellhead compressor and will be minimal.

La Plata County Compass:

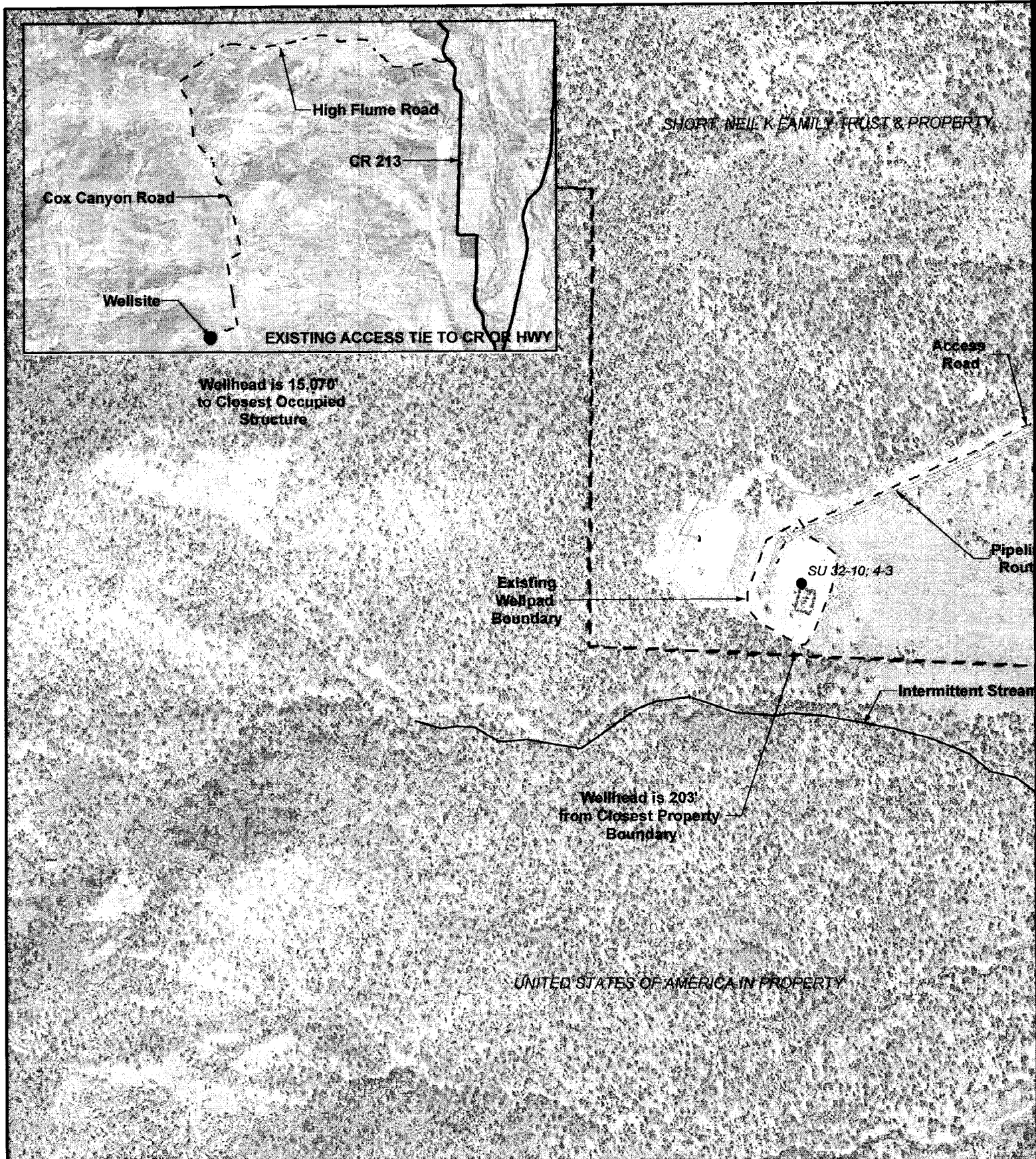
Core strategies of the La Plata County Compass strategic plan include vitality, sustainable development, transportation, healthy natural environment, organizational excellence, and thriving families and healthy community. BP well sites support the core components of La Plata's County' Strategic Plan in the following ways.

This project aligns with the healthy natural environment and economic vitality strategies in the plan by increasing sellable gas from the area while minimizing truck traffic and surface disturbance.



LEGEND:

PARCELS	-----	ACCESS ROAD	-----
SUBDIVISION BOUNDARY	=====	TRANS LINE	=====
TEMPORARY USE AREA	- - - - -	STRUCTURES	=====
GAS & WATER PIPELINES	=====	FRUITLAND WELLS	●
EXISTING PIPELINES	=====	PIPELINE/ROAD R.O.W	-----
HYDRO	=====	PRODUCTION EQUIPMENT	=====



LEGEND:

PARCELS	-----	ACCESS ROAD	-----
SUBDIVISION BOUNDARY	=====	TRANS LINE	=====
TEMPORARY USE AREA	-----	STRUCTURES	=====
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