

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Tuesday, July 21, 2015 7:49 AM
To: Dave Kubeczko - DNR
Subject: FW: BP America Production Company, Seibel A 2 Pad, SESE Sec 8 T32N R5W, Archuleta County, Form 2A#400833308 Review

Categories: Operator Correspondence

Scan No 2107627

OPERATOR CORRESPONDENCE

2A#400833308

From: Campbell, Patricia [mailto:Patricia.Campbell@bp.com]
Sent: Thursday, July 16, 2015 4:04 PM
To: Dave Kubeczko - DNR
Subject: RE: BP America Production Company, Seibel A 2 Pad, SESE Sec 8 T32N R5W, Archuleta County, Form 2A#400833308 Review

Hi Dave,

Per COA 58, BP will not be adding any additional tanks to this site.

Thank you,

Patti Campbell
Regulatory Analyst
(970) 335-3828 (Office)
(970) 375-7529 (Fax)
patricia.campbell@bp.com

From: Campbell, Patricia
Sent: Thursday, July 16, 2015 4:00 PM
To: 'Dave Kubeczko - DNR'
Subject: RE: BP America Production Company, Seibel A 2 Pad, SESE Sec 8 T32N R5W, Archuleta County, Form 2A#400833308 Review

Hi Dave,

BP agrees to the COAs listed below.

COA 58 under Construction will not apply, BP will to be adding any additional tanks to this site.

Thank you,

Patti Campbell
Regulatory Analyst
(970) 335-3828 (Office)
(970) 375-7529 (Fax)
patricia.campbell@bp.com

From: Dave Kubeczko - DNR [mailto:dave.kubeczko@state.co.us]
Sent: Tuesday, July 14, 2015 1:25 PM

To: Campbell, Patricia

Subject: BP America Production Company, Seibel A 2 Pad, SESE Sec 8 T32N R5W, Archuleta County, Form 2A#400833308 Review

Patti,

I have been reviewing the Seibel A 2 Pad **Form 2A** (#400833308). COGCC would like to attach the following additional conditions of approval (COAs) based on the data BP America Production Company (BP) has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

Planning: The following conditions of approval (COAs) will apply:

COA 91 - Notify the COGCC 48 hours prior to start of pad construction, rig mobilization, spud, start of hydraulic stimulation operations, start of flowback operations (if different than start of hydraulic stimulation operations), and pipeline testing using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

Construction: The following conditions of approval (COAs) will apply:

COA 23 - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Proposed BMPs and Facility Layout Drawing attachments); 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 per CDPHE requirements and after significant precipitation events), and maintained in good condition.

COA 58 - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with poly liner) to contain any spilled or released material around permanent crude oil, condensate, and produced water storage tanks.

Drilling/Completions: The following conditions of approval (COAs) will apply:

COA 37 - Lighting abatement measures beyond the requirements of Rule 803. shall be implemented, including the following, at a minimum: (1) rig oriented to direct light away from nearby residents; and (2) install lighting shield devices on all of the more conspicuous lights.

COA 38 - The moisture content of drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids greater than de minimis amounts.

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, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) 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 constructed to be sufficiently impervious to contain any spilled or released material.

COA 26 - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

Material Handling and Spill Prevention: The following conditions of approval (COAs) will apply:

COA 45 - Operator shall pressure test pipelines in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network.

Operator shall also adhere to the BMPs listed on the Operator BMP/COA Tab as well as to the following rule.:

Rule 604.c.(2). A. thru W.:

604. SETBACK AND MITIGATION MEASURES FOR OIL AND GAS FACILITIES, DRILLING, AND WELL SERVICING OPERATIONS

c. **Mitigation Measures.** The following requirements apply to an Oil and Gas Location within a Designated Setback Location and such requirements shall be incorporated into the Form 2A or associated Form 2 as Conditions of Approval.

(2) **Location Specific Requirements – Designated Setback Locations.** Subject to Rule 502.b., the following mitigation measures shall apply to any Well or Production Facility proposed to be located within a Designated Setback Location for which a Form 2 Application for Permit to Drill or Form 2A Oil and Gas Location Assessment is submitted on or after August 1, 2013: In particular:

C. Green Completions - Emission Control Systems.

F. Leak Detection Plan.

M. Fencing requirements (if required by surface owner).

N. Control of fire hazards.

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
Western Colorado



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