

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Wednesday, November 18, 2015 11:02 AM  
**To:** dave.kubeczko@state.co.us  
**Subject:** FW: BP America Production Company, Hott 30-02 & Horther 31-03 3 Pad, Lot 3 (NWSW) Sec 30 T33N R6W, La Plata County, Form 2A#400913015 Review

**Categories:** Operator Correspondence

Scan No 2107702      CORRESPONDENCE      2A#400913015

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**From:** Azulai, Naomi [mailto:[Naomi.Azulai@bp.com](mailto:Naomi.Azulai@bp.com)]  
**Sent:** Friday, November 06, 2015 11:38 AM  
**To:** Dave Kubeczko - DNR  
**Cc:** Campbell, Patricia  
**Subject:** RE: BP America Production Company, Hott 30-02 & Horther 31-03 3 Pad, Lot 3 (NWSW) Sec 30 T33N R6W, La Plata County, Form 2A#400913015 Review

Hi Dave,  
BP concurs with the COAs listed in your email below.  
Thank you.  
Naomi

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**From:** Dave Kubeczko - DNR [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, November 04, 2015 8:04 AM  
**To:** Azulai, Naomi  
**Cc:** Campbell, Patricia  
**Subject:** BP America Production Company, Hott 30-02 & Horther 31-03 3 Pad, Lot 3 (NWSW) Sec 30 T33N R6W, La Plata County, Form 2A#400913015 Review

Naomi,

I have been reviewing the Hott 30-02 & Horther 31-03 3 Pad **Form 2A #400913015**. COGCC would like to attach the following additional conditions of approval (COAs) based on the data BP has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following condition of approval (COA) will apply:

**COA 91** - In addition to the notifications required by COGCC listed in the Northwest Notification Policy and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment; b. Notice of Spud; and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to rig mobilization and pipeline testing (flowlines from wellheads to separators to tanks; and/or any temporary surface lines used for hydraulic stimulation and/or flowback operations) using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

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

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations (as shown on the Proposed BMPs attachment); 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 fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals as required by CDPHE (at least every 14 days and after precipitation events), and

maintained in good condition. The design/build of any perimeter berm shall be sized, constructed, and compacted sufficiently to contain fluids during drilling operations, as well as all fluids contained in temporary frac tanks during completion operations.

**COA 76** - Strategically apply fugitive dust control measures, including encouraging established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

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

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

**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 or storage vessel 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 (flowlines from wellheads to separators to tanks; and any temporary surface lines used for hydraulic stimulation and/or flowback operations) 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.

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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