

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, March 02, 2017 1:40 PM
To: Dave Kubeczko - DNR
Subject: BP America Production Company, Carmelita Gallegos A 1 Pad, SWSE Sec 17 T32N R5W, La Plata County, Form 2A#401156218 Review

Importance: High

Categories: Operator Correspondence

Scan No. 2108076 Rule 604.c.(2). Mitigation Measures 2A #401156218

From: Azulai, Naomi [mailto:Naomi.Azulai@bp.com]
Sent: Thursday, March 02, 2017 1:07 PM
To: Dave Kubeczko - DNR
Subject: BP America Production Company, Carmelita Gallegos A 1 Pad, SWSE Sec 17 T32N R5W, La Plata County, Form 2A#401156218 Review
Importance: High

Dave,

Please see below the BMPs that should be added to our form 2A for the Carmelita Gallegos A 1 Pad per your email.

Thanks.

Naomi

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, the operator should provide site-specific BMPs and/or mitigation measures for the following items, in particular, those highlighted in yellow:

- A. Noise.
- B. Closed Loop Drilling Systems – Pit Restrictions.
- C. Green Completions – Emission Control Systems.
- D. Traffic Plan.
- E. Multi-well Pads.
- F. Leak Detection Plan.
- G. Berm construction.
- H. Blowout preventer equipment (“BOPE”).
- I. BOPE testing for drilling operations.
- J. BOPE for well servicing operations.
- K. Pit level indicators.
- L. Drill stem tests.
- M. Fencing requirements.
- N. Control of fire hazards.
- O. Loadlines.

P. Removal of surface trash.

Q. Guy line anchors.

R. Tank specifications.

S. Access roads.

T. Well site cleared.

U. Identification of plugged and abandoned wells.

V. Development from existing well pads.

W. Site-specific measures.

A. Noise – The type of equipment planned for this site during the production operations phase is expected to remain below COGCC's acceptable noise limits. Noise levels will be tested at the request of nearby property owners. Sound levels will be measured in accordance with COGCC Rule 802.c. If the noise levels are found to exceed COGCC permissible levels, then BP will implement measures such as mufflers or sound walls. Production operations phase includes the permanent equipment set on location once drilling and completions has concluded.

B. Closed-loop Drilling Systems – Addressed in the APDs submitted for the proposed well planned on this site. No pits are planned.

C. Green Completions/Emission Control Systems - Coal wells do not utilize a flowback process. A post frac clean out is performed to prepare the well for production. During the cleanout procedure, fluids are routed to a temporary tank. Once gas starts to flow, the well is shut in so that gas is not released and can be routed to production. BP does not anticipate venting or flaring. In the unlikely event the well cannot be shut in in a timely manner, the gas would be vented through the temporary tank.

F. Leak Detection Plan – A wellsite-based monitoring system can automatically shut-in the wells upon the occurrence of anomalous conditions such as pressures outside of normal operating range in the water/gas pipelines on the downstream side of a well's water/gas separator vessel or high water levels in tanks monitored by float switches. In addition, locations are continuously monitored by remote SCADA system. In the event of an unintentional release, BP will report the event as required by COGCC regulations, Rule 906, Spills and Releases. Immediate actions will be taken to stop the source and minimize potential offsite impact. If necessary, clean-up will be initiated as soon as possible, consistent with COGCC 1000 series regulations.

G. Berm Construction – All secondary containment requirements will be met for buffer/exception zone setback.

M. Fencing – Cattle panels around equipment or adequate fencing such as to support interim reclamation will be installed.

N. Control of Fire Hazards – Any material not in use that might constitute a fire hazard will be removed a minimum of 25 feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area will comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado.

P. Removal of Surface Trash – All surface trash, debris, scrap or discarded material connected with the operation will be removed from the premises and disposed of in a legal manner.

R. Tank Specifications – No crude oil or condensate storage is planned as a result of this operation.

S. Access Roads – Access roads will accommodate emergency vehicle access and will be maintained in a reasonable condition.

W. Site Specific Measures – The existing access road will be rerouted around the proposed wellhead to maintain full access to the site. During drilling/completions operations the site lighting shall be directed downward and inward and shielded (to the extent practicable) so as to avoid glare on public roads and building units within 1000'. Once the well is in production operations phase, no permanent lighting will be installed on the pad.