

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, May 25, 2010 11:21 AM
To: Kubeczko, Dave
Subject: FW: BP America Prod Co, Eldridge 25-02 2, NESW Sec 25 T33N R11W, La Plata County, Form 2A (#2582420) Review

Scan No 2033154 CORRESPONDENCE 2A#2582420

From: Folk, Susan J [mailto:Susan.Folk@bp.com]
Sent: Tuesday, May 25, 2010 7:49 AM
To: Kubeczko, Dave
Subject: RE: BP America Prod Co, Eldridge 25-02 2, NESW Sec 25 T33N R11W, La Plata County, Form 2A (#2582420) Review

David,

Please make the change to a depth to groundwater of less than 20 feet bgs per information provided below.

BP concurs with attaching the following COA's to the Form 2A permit:

COA 4 - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

COA 1 - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.

COA 8 - Location is in a sensitive area because of shallow groundwater; therefore production pits must be lined.

Please let me know if you have need any additional information.

Thank you,

Susan

Susan J Folk
Infill Permitting Coordinator
San Juan Coalbed Methane Infill Project
(970) 335-3828 (Office)
Susan.Folk@bp.com

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Saturday, May 15, 2010 12:29 PM
To: Folk, Susan J
Subject: BP America Prod Co, Eldridge 25-02 2, NESW Sec 25 T33N R11W, La Plata County, Form 2A (#2582420) Review

Susan,

I have been reviewing the Eldridge 25-02 2 **Form 2A** (#2582420). COGCC requests the following clarifications regarding the data BP America has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 20 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area** (which BP has already indicated on the Form 2A). The following conditions of approval (COAs) will apply:
 - COA 4** - Location is in a sensitive area because of proximity to surface water; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 62 feet bgs for a well located 3108 feet from the proposed facility. COGCC's review indicates there is a water well (Permit No. 125364-Eldridge, domestic/stock well) located approximately 3303 feet to the south, with a total depth of 20 feet bgs, a depth to groundwater of less than 20 feet bgs, and a pumping rate of 15 gpm. I can make the changes if you send an email with this request. Based on the close proximity of the well pad to the same surface water that this well is adjacent to, the following COAs will apply:
 - COA 1** - Location is in a sensitive area because of shallow groundwater; therefore either a lined drilling pit or closed loop system must be implemented.
 - COA 8** - Location is in a sensitive area because of shallow groundwater; therefore production pits must be lined.

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) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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