

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, March 30, 2010 8:48 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Berry Petroleum, Chevron F31 596 PAD 31-21D, SNW Sec 31 T5S R96W, Garfield County, Form 2A #400040031 Review

Scan No 2033026      CORRESPONDENCE      2A#400040031

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**From:** Keidel, Jannette E. [mailto:JEK@bry.com]  
**Sent:** Thursday, March 25, 2010 10:30 AM  
**To:** Kubeczko, Dave  
**Cc:** Keidel, Jannette E.  
**Subject:** RE: Berry Petroleum, Chevron F31 596 PAD 31-21D, SNW Sec 31 T5S R96W, Garfield County, Form 2A #400040031 Review

Dave,  
Please see my comments in red for your request for clarifications.

1. **Rule 303.d.(3).A.:** There are no location pictures in the attachments. A minimum of four color photographs; one of the staked location from each of the cardinal directions. Each photograph shall be identified by: date taken, well or location name, and direction of view. **I have requested our surveyors go out and get updated pictures to comply with new COGCC rules, since there is snow on the ground it may take a few weeks before they are able to get.**
2. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (02/25/2010) unless the reference area is adjacent to the proposed pad and vegetation can be seen on the location pictures. Since no location pictures were submitted to show this, reference area photos will be required. **I have requested our surveyors go out and get updated pictures to comply with new COGCC rules, since there is snow on the ground it may take a few weeks before they are able to get.**
3. **General:** COGCC's review indicates that the well pad location is approximately 9980 feet from the current western edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
  - COA 9** - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used. **Berry Petroleum Company will comply.**
  - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval. **Berry Petroleum Company will comply.**
  - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids. **Berry Petroleum Company will comply.**
  - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1. **Berry Petroleum Company will comply.**
  - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

**Berry Petroleum Company will comply.**

**Thank you,  
Janni**

Janni Keidel  
Regulatory Agent  
Berry Petroleum Company  
1999 Broadway, Suite # 3700  
Denver, Colorado 80202  
303-999-4225 Direct line  
303-999-4325 Direct Fax line

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, March 15, 2010 8:37 PM  
**To:** Keidel, Jannette E.  
**Subject:** Berry Petroleum, Chevron F31 596 PAD 31-21D, SNW Sec 31 T5S R96W, Garfield County, Form 2A #400040031 Review

Janni,

I have been reviewing the Chevron F31 596 PAD 31-21D **Form 2A** (#400040031). COGCC requests the following clarifications regarding the data Berry Petroleum has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

4. **Rule 303.d.(3).A.:** There are no location pictures in the attachments. A minimum of four color photographs; one of the staked location from each of the cardinal directions. Each photograph shall be identified by: date taken, well or location name, and direction of view.
5. **Rule 303.d.(3).F.ii.aa and bb:** Since the current and future land uses are non crop land (rangeland), four (each of the cardinal directions) color photographs taken during the growing season of the reference area are required within 12 months of the Form 2A permit application date (02/25/2010) unless the reference area is adjacent to the proposed pad and vegetation can be seen on the location pictures. Since no location pictures were submitted to show this, reference area photos will be required.
6. **General:** COGCC's review indicates that the well pad location is approximately 9980 feet from the current western edge of the area defined in the notice to operators (NTO) for drilling wells on the Roan Plateau in Garfield County. Due to the highly fractured nature of the surface material in the area around the Roan Rim, the following conditions of approval (COAs) will apply:
  - COA 9** - Reserve pit must be lined. If the existing reserve/drilling or multi-well pit is not lined, then it must be lined in accordance with COGCC Rule 904 prior to being used.
  - COA 40** - The nearby hillside must be monitored for any day-lighting of drilling fluids throughout the drilling of the surface casing interval.
  - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
  - COA 38** - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
  - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed. 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**

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
707 Wapiti Court, Suite 204  
Rifle, CO 81650  
Phone: (970) 625-2497x5  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)



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