

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, March 30, 2010 8:49 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Berry Petroleum, Chevron "C12 697" PAD Chevron 12-8D, NENW Sec 12 T6S R97W, Garfield County, Form 2A #400043020 Review

**Importance:** High

Scan No 2033027      CORRESPONDENCE      2A#400043020

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**From:** Keidel, Jannette E. [mailto:JEK@bry.com]  
**Sent:** Thursday, March 25, 2010 10:38 AM  
**To:** Kubeczko, Dave  
**Cc:** Keidel, Jannette E.  
**Subject:** RE: Berry Petroleum, Chevron "C12 697" PAD Chevron 12-8D, NENW Sec 12 T6S R97W, Garfield County, Form 2A #400043020 Review  
**Importance:** High

Dave,

1. **Construction (Section 6):** The dates for construction (09/01/2009) and interim reclamation (06/01/2011) appear to be incorrect since the construction date has already passed. Can you confirm the estimated drilling/completion schedule and these dates. I can make the change if you send an email with this request. **The construction date should be 10-01-2010, interim reclamation will be 6-30-2011**
2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 384 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area**. 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.  
**Berry Petroleum Company will comply with the above COA's**
3. **General:** COGCC's review indicates that the well pad location is within the current 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.
  - 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.  
**Berry Petroleum Company will comply with the above COA's**

4. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within ¾ Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

**COA 6** - All pits must be lined. **Berry Petroleum Company will comply with the COA**

Thank you Dave,  
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 8:36 PM

**To:** Keidel, Jannette E.

**Subject:** Berry Petroleum, Chevron "C12 697" PAD Chevron 12-8D, NENW Sec 12 T6S R97W, Garfield County, Form 2A #400043020 Review

Janni,

I have been reviewing the Chevron C12 697 PAD Chevron 12-8D **Form 2A** (#400043020). 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 (OGLA).

5. **Construction (Section 6):** The dates for construction (09/01/2009) and interim reclamation (06/01/2011) appear to be incorrect since the construction date has already passed. Can you confirm the estimated drilling/completion schedule and these dates. I can make the change if you send an email with this request.
6. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 384 feet. COGCC guidelines require designating all locations within close proximity to surface water (i.e., less than 500 feet) a **sensitive area**. 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.
7. **General:** COGCC's review indicates that the well pad location is within the current 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.
- 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.

8. **Notice to Operators (NTO) Drilling Wells on the Roan Plateau in Garfield County:** Comply with all provisions of the June 12, 2008 Notice to Operators (NTO) Drilling Wells Within  $\frac{3}{4}$  Mile of the Rim of the Roan Plateau in Garfield County – Pit Design, Construction, and Monitoring Requirements. At a minimum, the following condition of approval (COA) will apply:

**COA 6** - All pits must be lined.

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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