



LINN ENERGY, LLC

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February 16, 2017

Colorado Oil and Gas Conservation Commission
ATTN: Matt Lepore, Director
1120 Lincoln St., Suite 801
Denver, CO 80203

RE: Request a Rule 502.b(1) Variance to NTO: Procedures for Preset Conductors for LINN Operating, Inc.
(10516)

Dear Mr. Lepore:

As part of its Chapter 11 Bankruptcy emergence, LINN Operating, Inc. (LINN) will separate all of the Colorado assets that it gained when it acquired Berry Petroleum Company LLC (10091) in June 2014. Currently, the effective date of Change of Operator is set for 5/1/2017. Therefore, LINN requests a Rule 502.b(1) variance to extend the performance requirement of the March 1, 2017 date set forth in the *Notice to Operators: Procedures for Preset Conductors* to September 1, 2017 for the following reasons:

1. To allow time for the new operator of record to transition all of the properties, records and systems, and then to evaluate its assets and decide for itself how to best proceed.
2. Due to the climate and elevations of most of the properties, the earliest that an operator could access the properties to perform plugging/reclamation work, IF that is the route that is chosen, would minimally be May 1, 2017.

There are 28 locations with 1 or more pre-set conductors located in Garfield County that were all in existence at the time this NTO was issued on September 1, 2016. Attached is the information about each location.

Pushing back the performance requirement date to September will not violate the basic intent of the Oil and Gas Conservation Act. We are minimizing the chances of creating a greater disturbance of the environment and wildlife if we reclaimed all of the affected locations before the new operator has the opportunity to review, because there is the potential for them to have to re-permit and re-build the locations in order to drill. This could potentially double the environmental impact to the area unnecessarily.

Furthermore, LINN certifies that the new operator has been made aware of the requirements of the NTO and the variance request. If you have any questions, please feel free to contact me at (281) 840-4375 or mfoster@linnenergy.com.

Sincerely,

A handwritten signature in blue ink that reads "Mike Foster".

Michael Foster
Regulatory Specialist II

	Facility Name	Facility Number	Location ID	County Name/Code	Location	# Pre-Set Conductors on Location
1	CHEVRON C19 596		417618	GARFIELD 045	Lot 1 19 5S 96W 6	1
2	Chevron	CD-29 596	335965	GARFIELD 045	NENW 29 5S 96W 6	7
3	Chevron	D05 696	335981	GARFIELD 045	Lot 4 5 6S 96W 6	4
4	CHEVRON E18 696		335998	GARFIELD 045	SWNW 18 6S 96W 6	1
5	BERRY F01 697		335716	GARFIELD 045	SEnw 1 6S 97W 6	5
6	Chevron	F06 696	335887	GARFIELD 045	Lot 11 6 6S 96W 6	1
7	CHEVRON I01 697		335693	GARFIELD 045	NESE 1 6S 97W 6	3
8	LATHAM	I02 697	415531	GARFIELD 045	NESE 2 6S 97W 6	1
9	CHEVRON I19 596		335869	GARFIELD 045	NESE 19 5S 96W 6	2
10	OXY	I21 697	416468	GARFIELD 045	NESE 21 6S 97W 6	4
11	CHEVRON I31 596		335964	GARFIELD 045	NESE 31 5S 96W 6	6
12	CHEVRON J20 596		335841	GARFIELD 045	NWSE 20 5S 96W 6	5
13	CHEVRON L35 596		335912	GARFIELD 045	NWSW 35 5S 96W 6	2
14	CHEVRON	O06 696	335966	GARFIELD 045	NWSE 6 6S 96W 6	3
15	OXY O22 697		416503	GARFIELD 045	SWSE 22 6S 97W 6	1
16	LATHAM	O32 696	335840	GARFIELD 045	SWSE 32 5S 96W 6	3
17	Long Ridge	D21 595	335673	GARFIELD 045	NWNW 21 5S 95W 6	6
18	Long Ridge	I16 595	335834	GARFIELD 045	NESE 16 5S 95W 6	8
19	LONG RIDGE	J15 595	335568	GARFIELD 045	NWSE 15 5S 95W 6	2
20	LONG RIDGE	M15 595	335865	GARFIELD 045	SWSW 15 5S 95W 6	1
21	LONG RIDGE	M16 595	311634	GARFIELD 045	SWSW 16 5S 95W 6	4
22	Long Ridge Pad	N15 595	335835	GARFIELD 045	SESW 15 5S 95W 6	8
23	Long Ridge	O16 595	335838	GARFIELD 045	SWSE 16 5S 95W 6	8
24	SCHOOL HOUSE POINT	OM B21 696	421108	GARFIELD 045	NENE 21 6S 96W 6	5
25	GRANLEE OM C10 696		335876	GARFIELD 045	NENW 10 6S 96W 6	2
26	GRANLEE OM I02 696		335617	GARFIELD 045	SENE 2 6S 96W 6	3
27	SCHOOL POINT OM K15 696		335991	GARFIELD 045	NESW 15 6S 96W 6	4
28	SCHOOL HOUSE POINT OM L15 696		335979	GARFIELD 045	NWSW 15 6S 96W 6	1
	TOTAL					101