

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, March 24, 2010 2:14 PM
To: Kubeczko, Dave
Subject: FW: Oxy USA WTP, Cascade Creek 609-14, SWSW Sec 9 T6S R97W, Garfield County, Form 2A #400028636 Review

Scan No 2033005 CORRESPONDENCE 2A#400028636

From: Joan_Proulx@oxy.com [mailto:Joan_Proulx@oxy.com]
Sent: Wednesday, March 17, 2010 4:11 PM
To: Kubeczko, Dave
Subject: RE: Oxy USA WTP, Cascade Creek 609-14, SWSW Sec 9 T6S R97W, Garfield County, Form 2A #400028636 Review

Dave:

Please note my responses in order of your items:

1. Facilities: There is a separate blooie indicated on the plat; however, this is actually not a pit but a flare box as confirmed by our engineers. If you would like to have the plat re-name this blooie to a flare box, please let me know.
2. The estimated start date for drilling is June 15, 2010.

Oxy concurs with the COAs. Thank for bringing the other items to my attention; I appreciate your assistance. Please let me know if there are further questions.

Regards,

Joan

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Tuesday, March 16, 2010 10:47 AM
To: Proulx, Joan M
Subject: Oxy USA WTP, Cascade Creek 609-14, SWSW Sec 9 T6S R97W, Garfield County, Form 2A #400028636 Review

Joan,

I have been reviewing the Cascade Creek 609-14 **Form 2A** (#400028636). 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).

1. **Facilities (Section 5):** The construction layout drawings (1 of 5) indicate that there will be a separate flare pit (Blooie) located southeast of the existing pit. This flare pit needs to be marked as a special purpose pit on the Form 2A and a Form 15 (Earthen Pit Report/Permit) must be submitted. I can make the change if you send an email with this request.
2. **Construction (Section 6):** The date for construction (10/15/2008) appears to be incorrect since the construction date has already passed. Can you confirm the estimated drilling/completion schedule and these dates (for the construction date COGCC would like to know approximately when the first well will be drilled). I can make the change if you send an email with this request.

3. **Water Resources (Section 14):** Based on the information provided and verified by COGCC, this is not considered a sensitive area; therefore, I will mark the no box for "Is this a sensitive area:".
4. **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.
5. **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.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs 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

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