

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Thursday, October 21, 2010 4:14 PM
To: Kubeczko, Dave
Subject: FW: Berry Petroleum, Long Ridge Pad O16 595, SWSE Sec 16 T5S R95W, Garfield County, Form 2A #400102253 Review

Categories: Orange Category

Scan No 2033471 CORRESPONDENCE 2A#400102253

From: Moran, Kallasandra M. [<mailto:kmoran@bry-consultant.com>]
Sent: Thursday, October 21, 2010 3:58 PM
To: Kubeczko, Dave
Subject: RE: Berry Petroleum, Long Ridge Pad O16 595, SWSE Sec 16 T5S R95W, Garfield County, Form 2A #400102253 Review

Dave,

Berry Petroleum Company concurs with the COAs below.

Thanks!

Kallasandra M. Moran
Permit Agent
Berry Petroleum Company
1999 Broadway
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Denver, Colorado 80202

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From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Thursday, October 21, 2010 3:56 PM
To: Moran, Kallasandra M.
Subject: Berry Petroleum, Long Ridge Pad O16 595, SWSE Sec 16 T5S R95W, Garfield County, Form 2A #400102253 Review

Kallasandra,

I have been reviewing the Long Ridge Pad O16 595 **Form 2A** (#400102253). COGCC will attach the following conditions of approval (COAs) based on the data Berry Petroleum has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **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; therefore, this location will be designated a **sensitive area**. 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 - Any pit constructed to hold fluids (reserve pit, production pit; except for flare 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 46 - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and /or stormwater runoff.

COA 23 - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water. 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.

2. **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 (items 1 and 2) 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) 309-2514 (cell), or email. Thanks.

Dave

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

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