

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Monday, January 03, 2011 9:30 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Berry Petroleum, School House Point OM B21 696 Pad, NENE Sec 21 T6S R96W, Garfield County, Form 2A #400114565 Review

**Categories:** Orange Category

Scan No 2033565      CORRESPONDENCE      2A#400114565

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**From:** Moran, Kallasandra M. [mailto:kmoran@bry-consultant.com]  
**Sent:** Monday, January 03, 2011 8:59 AM  
**To:** Kubeczko, Dave  
**Subject:** RE: Berry Petroleum, School House Point OM B21 696 Pad, NENE Sec 21 T6S R96W, Garfield County, Form 2A #400114565 Review

Dave,

Berry Petroleum Company concurs with the COAs.

Thanks!

Kallasandra M. Moran  
Permit Agent  
Berry Petroleum Company  
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Suite 3700  
Denver, Colorado 80202

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Friday, December 31, 2010 6:20 PM  
**To:** Moran, Kallasandra M.  
**Subject:** Berry Petroleum, School House Point OM B21 696 Pad, NENE Sec 21 T6S R96W, Garfield County, Form 2A #400114565 Review

Kallasandra,

I have been reviewing the School House Point OM B21 696 Pad **Form 2A** (#400114565). COGCC would like to attach the following conditions of approval (COAs) based on the information on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Soils (Section 12):** Form 2A indicates that the soil type is Map Unit #62. Rock outcrop-Torriorthents complex, very steep. COGCC's review indicates that this soil type is located further west and that the soil type at this pad location is Map Unit #36. Irigul channery loam, 9 to 50 percent slopes. I have added this to the Form 2A and added the description to the attachments.
2. **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 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines.

**COA 9** - Any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) must be lined.

**COA 10** - Since the operator will be running up to 10 percent (by volume) diesel oil in the water based drilling mud as a shale stabilization and friction reduction additive while drilling the production hole interval, any pit constructed to hold fluids must be permitted, and approved, prior to construction and use (a Form 15 [Earthen Pit Report/Permit] will need to be submitted). Additional COAs may be attached to the Form 15.

**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; 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., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)). Under unforeseen upset conditions during flowback operations, operator may discharge flowback fluids directly into the pit, as needed (notice of intent to directly discharge into the pit must be sent to Dave Kubeczko; email [dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)).

**COA 58** - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.

**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.

3. **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. 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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