



COGCC Form 2A review of Bonanza Creek Energy's State Antelope D-13 Pad - Doc #400525315

6 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Randy Edelen <REdelen@bonanzacrk.com>

Wed, Jan 29, 2014 at 11:14 AM

Randy,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

A) Because you plan to use Modular Large Volume Tanks (MLVT) at this oil and gas location, please provide me with the following additional information: the manufacturer of the MLVTs, the anticipated timeframe the MLVTs will be onsite, and a Facility Layout Drawing indicating where the MLVTs will be located with respect to other facility equipment, property boundaries and setback structures.

B) Because you plan to use MLVTs at this oil and gas location, I would like to add the following Conditions of Approval:

1. MLVTs may only be utilized for the storage of freshwater. E&P wastes, including produced water, treated E&P wastes, and flowback from hydraulic fracturing operations, are not allowed.
2. MLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and MLVT installation oversight shall be provided by a Professional Engineer or their designated representatives. Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications.
4. COGCC Rules 604.a. and 605.a.(2,3,5,6,7, and 8), as applicable to tank setbacks at the time of installation shall apply to the siting of MLVTs.
5. All MLVT liner seams shall be welded at the liner manufacturers facility; field welded liners shall not be used. Liners shall not be reused.
6. Signs shall be posted on each MLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
7. MLVTs shall be operated with a minimum of 1 foot freeboard.
8. Operator shall be onsite and inspect for leaks during the initial filling of MLVTs. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.
9. Once in operation, MLVTs shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the MLVTs shall be limited to operational personnel.
11. Operators employing MLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Operator shall develop a contingency plan for any MLVT leak or catastrophic failure of the tank integrity and resulting loss of fluid. The plan should include a notification process to the COGCC and local emergency authority (municipal, county or both) for any failure and resulting loss of fluid.
13. Should a failure of TLVST integrity occur, operator shall notify COGCC upon discovery, report the incident to COGCC on a Form 22-Accident Report within 10 days, and shall conduct a root cause analysis and provide it to the COGCC on a Form 4-Sundry Notice within 30 days of the failure.

C) You have given an estimated date that interim reclamation will begin as 7/1/16. This is more than two years after the date you plan to commence construction (3/20/14). This is not in compliance with COGCC Rule 1003.b. given that the land use at this oil and gas location is non-crop land Rangeland. Please provide me with a revised estimated date that interim reclamation will begin.

D) A review of your Hydrology Map indicates there is an intermittent stream approximately 1,600 feet west and

topographically downgradient of the proposed Oil & Gas Location. Therefore, in the Water Resources section I will change the distance to the nearest downgradient surface water feature from 4,355 feet to 1,600 feet.

E) The Reference Area Pictures attachment contains only one picture of the Reference Area. Reference Area Pictures must be taken facing all four cardinal directions. Please provide me with all four Reference Area Pictures.

F) A Reference Area Map was not included with this Form 2A. Please provide me with your Reference Area Map.

Please provide me the requested items by March 1, 2014. If you have any questions, please feel free to contact me. Thank you.

–
Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us
303-894-2100 Ext. 5180

Randy Edelen <REdelen@bonanzacrk.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Jan 30, 2014 at 9:12 AM

Doug,

I would like to withdraw the MLVT from the permit. Please see answers to questions below.

Randy Edelen, P. E.

Regulatory Specialist

(720) 440-6136 Direct

(720) 440-6100 Main

(720) 279-2331 Fax

Bonanza Creek Energy, Inc.

410 17th Street

Suite 1400

Denver, CO 80202

[Bonanza Creek website](#)



From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]

Sent: Wednesday, January 29, 2014 11:15 AM

To: Randy Edelen

Subject: COGCC Form 2A review of Bonanza Creek Energy's State Antelope D-13 Pad - Doc #400525315

Randy,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

A) Because you plan to use Modular Large Volume Tanks (MLVT) at this oil and gas location, please provide me with the following additional information: the manufacturer of the MLVTs, the anticipated timeframe the MLVTs will be onsite, and a Facility Layout Drawing indicating where the MLVTs will be located with respect to other facility equipment, property boundaries and setback structures.

B) Because you plan to use MLVTs at this oil and gas location, I would like to add the following Conditions of Approval:

1. MLVTs may only be utilized for the storage of freshwater. E&P wastes, including produced water, treated E&P wastes, and flowback from hydraulic fracturing operations, are not allowed.
2. MLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and MLVT installation oversight shall be provided by a Professional Engineer or their designated representatives. Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications.
4. COGCC Rules 604.a. and 605.a.(2,3,5,6,7, and 8), as applicable to tank setbacks at the time of installation shall apply to the siting of MLVTs.
5. All MLVT liner seams shall be welded at the liner manufacturers facility; field welded liners shall not be used. Liners shall not be reused.
6. Signs shall be posted on each MLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
7. MLVTs shall be operated with a minimum of 1 foot freeboard.
8. Operator shall be onsite and inspect for leaks during the initial filling of MLVTs. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.
9. Once in operation, MLVTs shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the MLVTs shall be limited to operational personnel.
11. Operators employing MLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Operator shall develop a contingency plan for any MLVT leak or catastrophic failure of the tank integrity and resulting loss of fluid. The plan should include a notification process to the COGCC and local emergency authority (municipal, county or both) for any failure and resulting loss of fluid.
13. Should a failure of TLVST integrity occur, operator shall notify COGCC upon discovery, report the incident to COGCC on a Form 22-Accident Report within 10 days, and shall conduct a root cause analysis and provide it to the COGCC on a Form 4-Sundry Notice within 30 days of the failure.

C) You have given an estimated date that interim reclamation will begin as 7/1/16. This is more than two years after the date you plan to commence construction (3/20/14). This is not in compliance with COGCC Rule 1003.b. given that the land use at this oil and gas location is non-crop land Rangeland. Please provide me with a revised estimated date that interim reclamation will begin. **March 20, 2015**

D) A review of your Hydrology Map indicates there is an intermittent stream approximately 1,600 feet west and topographically downgradient of the proposed Oil & Gas Location. Therefore, in the Water Resources section I will change the distance to the nearest downgradient surface water feature from 4,355 feet to 1,600 feet. **I am in agreement with changing to 1,600 feet.**

E) The Reference Area Pictures attachment contains only one picture of the Reference Area. Reference Area Pictures must be taken facing all four cardinal directions. Please provide me with all four Reference Area Pictures. **Reference area pictures and map will be provided at a later date.**

F) A Reference Area Map was not included with this Form 2A. Please provide me with your Reference Area Map.

Please provide me the requested items by March 1, 2014. If you have any questions, please feel free to contact me. Thank you.

--

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

Colorado Oil & Gas Conservation Commission

1120 Lincoln St., Suite 801

Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Randy Edelen <REdelen@bonanzacrck.com>

Thu, Jan 30, 2014 at 10:32 AM

Randy,

I will remove the listing of the two Temporary Large Volume Tanks from this 2A.

Providing Reference Area Pictures and Map at some unspecified later date is not acceptable. I am willing place a COA on this 2A that indicates Bonanza Creek will submit four Reference Area Pictures taken during the 2014 growing season on a Form 4 Sundry to be submitted no later than September 30, 2014. However, I will not pass this 2A without the inclusion of where the Reference Area is. You know a Reference Area Map is required on all 2As that are for locations on Non-Crop Land and that it should have been included when the 2A was submitted to us. Bonanza Creek must have some idea of where this Reference Area will be because you did include a single picture of it with the 2A (see my original Comment E. above). If the Reference Area Map is not readily available, at least provide me the GPS coordinates of its location?

[Quoted text hidden]

Randy Edelen <REdelen@bonanzacrck.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

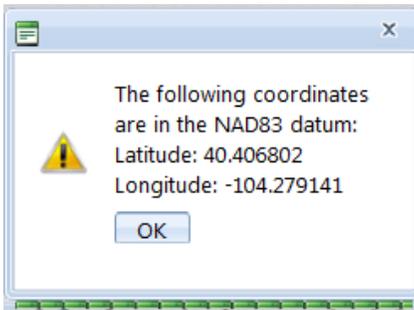
Thu, Jan 30, 2014 at 2:31 PM

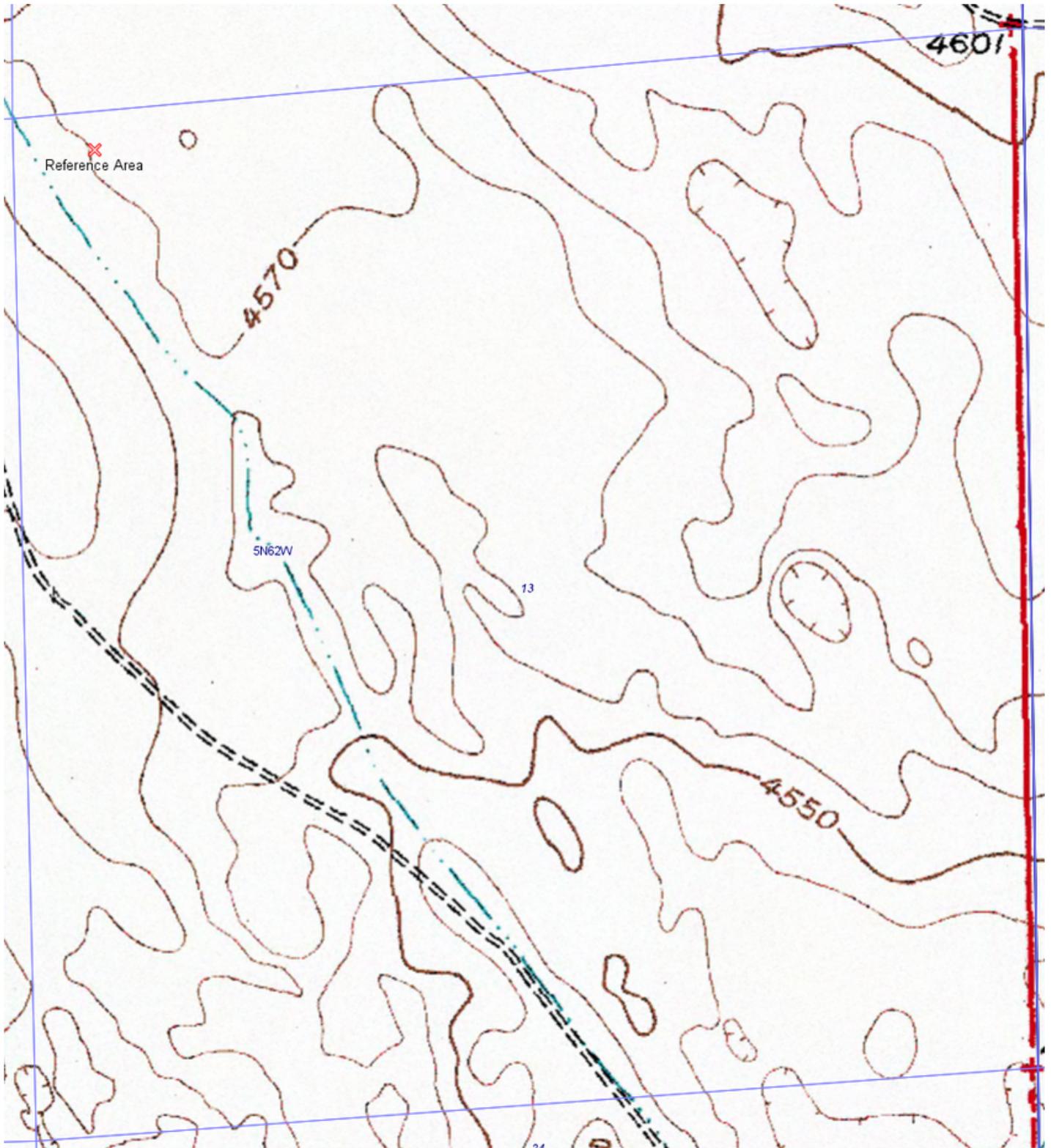
Doug,

I would like to use the previously established reference area for the State Antelope 11-13HZ location for this well also. The soil types for both locations are 70 Valent Sand so the vegetation in the reference area will be representative of the State Antelope D-13 pad. It is directly north of the State Antelope 11-13HZ location and I will send the picture of the north facing shot that includes the reference area.



The reference area is located here:





Please contact me if you have further questions or require additional information.

Thanks,

Randy Edelen, P. E.

Regulatory Specialist

(720) 440-6136 Direct

(720) 440-6100 Main

(720) 279-2331 Fax

Bonanza Creek Energy, Inc.

410 17th Street

Suite 1400

Denver, CO 80202

Bonanza Creek website



From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Thursday, January 30, 2014 10:32 AM
To: Randy Edelen
Subject: Re: COGCC Form 2A review of Bonanza Creek Energy's State Antelope D-13 Pad - Doc #400525315

[Quoted text hidden]

Andrews - DNR, Doug <doug.andrews@state.co.us> Thu, Jan 30, 2014 at 3:03 PM
To: Randy Edelen <REdelen@bonanzacrk.com>

Randy, that will work. However, can you send me a PDF of that Ref Area photo. I need it as a PDF to be able to attach it to the 2A. Thanks.

[Quoted text hidden]

Randy Edelen <REdelen@bonanzacrk.com> Thu, Jan 30, 2014 at 3:05 PM
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

No problem here you go.

Randy Edelen, P. E.

Regulatory Specialist

(720) 440-6136 Direct

(720) 440-6100 Main

(720) 279-2331 Fax

Bonanza Creek Energy, Inc.

410 17th Street

Suite 1400

Denver, CO 80202

Bonanza Creek website



From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Thursday, January 30, 2014 3:03 PM

[Quoted text hidden]

[Quoted text hidden]

 **STATE ANTELOPE D-13 PAD Reference Area.pdf**
108K