



STATE OF  
COLORADO

Andrews - DNR, Doug <doug.andrews@state.co.us>

## COGCC Form 2A review of Bill Barrett Corp's Anschutz Equus Farms North 4-62-9 location - Doc #400551777

2 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>  
To: Venessa Langmacher <vlangmacher@billbarrettcorp.com>

Thu, Feb 20, 2014 at 10:44 AM

Venessa,

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

A) In the Construction section you have indicated the date planned to commence construction as 2/1/14. The date planned to commence construction should be sometime in the future but given this is an existing location, I'm uncertain as to what this date corresponds to. Is this when BBC began constructing/drilling the previously permitted wells? The initial Form 2A indicated construction would begin in August 2013. Please provide some clarification.

B) Because Bill Barrett plans to use temporary large volume tanks (TLVTs) at this Oil and Gas Location, I would like to add the following Conditions of Approval:

1. TLVTs 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. TLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and TLVT 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 TLVTs.
5. All TLVT 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 the TLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
7. TLVTs shall be operated with a minimum of 1 foot freeboard.
8. Operator shall be onsite and inspect for leaks during the initial filling of the TLVT. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.
9. Once in operation, the TLVT shall be inspected daily and any deficiencies repaired as soon as practicable.

10. Access to the TLVT shall be limited to operational personnel.
11. Operators employing TLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Should a failure of TLVT 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.

Please let me know if this acceptable by March 20, 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](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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**Venessa Langmacher** <[vlangmacher@billbarrettcorp.com](mailto:vlangmacher@billbarrettcorp.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Thu, Feb 20, 2014 at 10:54 AM

Hi Doug,

Please see my comments below.

Venessa Langmacher

BILL BARRETT CORPORATION

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Thursday, February 20, 2014 10:45 AM  
**To:** Venessa Langmacher  
**Subject:** COGCC Form 2A review of Bill Barrett Corp's Anschutz Equus Farms North 4-62-9 location - Doc #400551777

Venessa,

I have reviewed the referenced Amended Form 2A Oil & Gas Location Assessment and have the

following comments.

A) In the Construction section you have indicated the date planned to commence construction as 2/1/14. The date planned to commence construction should be sometime in the future but given this is an existing location, I'm uncertain as to what this date corresponds to. Is this when BBC began constructing/drilling the previously permitted wells? The initial Form 2A indicated construction would begin in August 2013. Please provide some clarification.

2/1/14 was the date that the construction began for the wellpad. Originally we were hoping to start this location in August 2013 but due to road/bridge concerns it was pushed back.

B) Because Bill Barrett plans to use temporary large volume tanks (TLVTs) at this Oil and Gas Location, I would like to add the following Conditions of Approval:

1. TLVTs 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. TLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and TLVT 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 TLVTs.
5. All TLVT 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 the TLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
7. TLVTs shall be operated with a minimum of 1 foot freeboard.
8. Operator shall be onsite and inspect for leaks during the initial filling of the TLVT. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.
9. Once in operation, the TLVT shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the TLVT shall be limited to operational personnel.
11. Operators employing TLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Should a failure of TLVT 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.

BBC will comply with the above conditions for the use of TLVTs.

Please let me know if this acceptable by March 20, 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

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