

STATE OF
COLORADO

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

COGCC Form 2A review of Great Western's Raindance SESE Pad location - Doc #400528649

2 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Regulatory Permitting <regulatorypermitting@gwogco.com>

Wed, Apr 9, 2014 at 9:39 AM

Callie,

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

1) Based on our phone conversation yesterday there will be no production facilities on this oil and gas location, only the six wells and one temporary large volume tank (MLVT) to be used for completions. These wells will flow to the production facilities on the nearby Raindance SWSE Pad to the west. Therefore, I will remove the listing of 24 oil tanks, 5 water tanks, 24 separators, and 4 VOC combustors from the Facilities section and will indicate that Location ID #433424 (Raindance SWSE Pad) is the related remote location these wells will produce to.

2) In the Cultural Distance section you have indicated the distance to the nearest Property Line is 28 feet. I am uncertain as to how this distance was determined as it is unclear where the nearest property line is in relation to this proposed oil and gas location. What we really want the operator to tell us here is the distance to the nearest property line from the nearest well as the setback requirement for property lines is based on the nearest well. Please provide some additional clarification as to how the 28 feet distance was determined and if it is not based on the nearest well to a property line, please provide me with that distance and I will change it on the Cultural Distance section of the Form 2A.

3) Because you are proposing to use a MLVT at this location, please provide me with the following additional information: the manufacturer of the MLVT, the size/volume of the MLVT, and the anticipated timeframe it will be onsite.

4) Because there will be a MLVT utilized at this proposed 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 package certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and MLVT installation oversight shall be provided by a manufacturer representative either designated or otherwise certified to affirm that the site preparation and MLVT installation was completed in accordance with design specifications.
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 the 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 the MLVT. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.
9. Once in operation, the MLVT shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the MLVT 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 (municipality, county or both) for any failure and resulting loss of fluid. Best Management Practices shall be employed to prevent injuries, property damage or environmental impacts, such as erosion of onsite sediment into nearby surface water. The contingency plan shall be made available to the COGCC upon request.
13. Should a failure of MLVT 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 respond to this correspondence by May 9, 2014. If you have any questions, please feel free to contact me. Thank you.

—

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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Regulatory Permitting <regulatorypermitting@gwogco.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Apr 16, 2014 at 4:43 PM

Can we please change the property line distance to 461'?

1. The manufacturer of the TLVST is Industrial Systems Inc.
2. The size of the TLVST is a 50,000 BBL frac tank.

3. The anticipated time frame the TLVST will be onsite is two weeks prior to fracking.

We agree to all the COA's.

Thank you,



Callie Fiddes

Regulatory Technician

Direct: 303.398.0550

Fax: 866.742.1784

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

Sent: Wednesday, April 09, 2014 9:39 AM

To: Regulatory Permitting

Subject: COGCC Form 2A review of Great Western's Raindance SESE Pad location - Doc #400528649

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4/17/2014

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