



COGCC Form 2A review of Bill Barrett Corp's Ruh 6-62-11_14 NENW location - Doc #4005864452 messages

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

Mon, Apr 21, 2014 at 8:43 AM

To: Mary Pobuda <mpobuda@billbarrettcorp.com>

Mary,

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

- 1) Because this oil and gas location is on Dry land, which is a type of Crop Land, you are not required to submit Reference Area Pictures or Map. Therefore, I will remove the statement indicating you will submit Reference Area Pictures taken during the growing season within 12 months.
- 2) Because there will be two temporary large volume storage tanks (MLVTs) 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 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 manufacturer's 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. 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 21, 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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Mary Pobuda <mpobuda@billbarrettcorp.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Apr 21, 2014 at 4:19 PM

Hi Doug,

Thanks for removing the comment regarding reference photos. BBC accepts the COA's listed below for MLVTs. Thanks for your review.

Mary Pobuda

Permit Analyst

Bill Barrett Corporation

303-312-8511 direct | 720-402-7539 cell

mpobuda@billbarrettcorp.com

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

Sent: Monday, April 21, 2014 8:43 AM

To: Mary Pobuda

Subject: COGCC Form 2A review of Bill Barrett Corp's Ruh 6-62-11_14 NENW location - Doc #400586445

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