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To: Colorado Oil and Gas Conservation Commission

Subject: Modular Large Volume Tank COGCC Requirements

The Colorado Oil and Gas Conservation Commission (COGCC) have set forth a set of drawing package requirements for Modular Large Volume Tanks (MLVT). The requirements are listed below in items 1 through 8. The purpose of this memo is to provide verification that the Mobile Pond manufactured by PCI Mfg. meets the requirements set forth by COGCC. The lettered items below the requirements are comments from Dynamic Engineering Consultants, PLLC (DEC)

1. Detailed Tank Design
 - a. PCI Manufacturing has a complete set of detailed drawings for their tanks. These drawings have been reviewed and approved by DEC.
2. Specific tank installation and assembly procedures.
 - a. Tank installation and assembly is adequately addressed in the operating manual. Reference sections IV, V, and VI in the Standard Operating Procedures Manual.
3. Documentation of Appropriate site conditions for installation, which includes grades, bedding material, and potential weather impact.
 - a. This information is adequately addressed in the operating manual. Reference section III, Appendix B, & Appendix B.1 in the Standard Operating Procedures Manual.
4. Appropriate site preparation.
 - a. This information is adequately addressed in the operating manual. Reference section III, Appendix B, & Appendix B.1 in the Standard Operating Procedures Manual.
5. The required liner material and minimum thickness for the application along with applicable standards.
 - a. To be approved by others.
6. Liner installation procedures and quality control measures
 - a. To be approved by others.
7. Periodic Testing or re-inspection requirements including what to perform, when to perform, and testing guidelines/protocols
 - a. Perform visual panel inspections prior to assembly to verify the following:
 - i. Check the serial # on the panel to ensure that the proper panel is being used for the size of tank to be assembled.



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- ii. Visually inspect each panel to confirm that the panels are free of structural cracks or excessive deformations such as bent or torn components.
 - b. Perform visual tank inspection immediately after assembly is complete and prior to filling to verify the following:
 - i. The assembled diameter matches the design diameter. Visually inspect to verify that the assembled tank perimeter matches the perimeter line marked on the ground. The tank must be assembled in a circle to prevent excessive panel movements during filling.
 - ii. All hardware such as lug pins and mating caps have been properly installed (reference operating manual for details)
 - iii. Visually inspect each panel to ensure that the panels are free of structural cracks or excessive deformations such as bent or torn components.
 - c. Perform visual tank inspections on a daily basis while the tank is in operation to verify the following:
 - i. Visually inspect each panel and connection to ensure that the tank is free of structural cracks or excessive deformations such as bent or torn components.
- 8. Detailed Standard Operating Procedures (SOP) for all the items above.
 - a. The Operating manual supplied with the Mobile Pond includes all the items listed above that we have addressed except the inspection procedure. This needs to be added to the SOP

Thank you for confiding in Dynamic Engineering for your consulting needs.

Sincerely,

James W. Burnett, PE
Project Engineer
Dynamic Engineering

