

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Saturday, July 09, 2011 6:44 PM
To: Kubeczko, Dave
Subject: FW: Bill Barrett Corp, Federal (MDP Pad #13), 32A-20-691 Pad, SWNE Sec 20 T6S R91W, Garfield County, Form 2A#400167843 Review; (previously reviewed and approved Form 2A#400060976); COGCC Location ID#418061

Categories: Orange - Operator Correspondence

Scan No 2033916 CORRESPONDENCE 2A#400167843

From: Kubeczko, Dave
Sent: Saturday, July 09, 2011 6:39 PM
To: Mary Pobuda
Subject: Bill Barrett Corp, Federal (MDP Pad #13), 32A-20-691 Pad, SWNE Sec 20 T6S R91W, Garfield County, Form 2A#400167843 Review; (previously reviewed and approved Form 2A#400060976); COGCC Location ID#418061

Mary,

I have reviewed the Federal (MDP Pad #13), 32A-20-691 Pad **Form 2A** #400167843 (previously reviewed and approved [06-29-2010] Form 2A#400060976). All COAs from the original approval remain in effect for this location. Additionally, BBC has provided a list of Best Management Practices (BMPs) which detail some aspects of operations at the site. The COGCC will upload the following BMPs to the amended Form 2A.

NOTIFICATIONS

Proper notifications required by COGCC regulations or policy memos will be adhered to.

TRENCHES/PITS/TEMPORARY FRAC TANKS

Unlined pits will not be constructed on fill material.

Drill cuttings from the wellbore will be temporarily stockpiled on lined and bermed surface containments.

Any free liquids accumulated in the containment would be removed as soon as practicable.

Drilling pits utilized for completion operations will be permitted (if applicable) and lined, operated in accordance with COGCC regulations, specifically Rule 903 and Rule 904. All permitted pits (Form 15) will be closed per Rule 905 and non-permitted drilling pits would be closed in accordance with Rule 1003.

Drilling pits used for completion will be fenced with appropriate wildlife mesh on the bottom portion.

Appropriate netting will be installed within 30 days of the pit becoming inactive.

Flowback and stimulation fluids from the wells being completed will be sent to tanks and/or filters to allow the sand to settle out or pits constructed to minimize potential for abrasive damage to liners before the fluids are placed into the pit for reuse or disposal at a BBC SWD facility.

All flowback water will be confined to the lined completion pit or storage tanks for a period not to exceed ninety days and will be recycled for re-use, piped or trucked offsite to one of the approved disposal facilities below. Flowback sands stored on location will be remediated and buried on location or hauled to a state approved disposal facility.

Circle B Land 33A-35-692SWD, API# 05-045-18493, UIC# 159277

GGU Rodreick #21B-31-691 SWD, API# 05-045-13803, UIC# 159176

Specialty #13A-28-692 SWD, API# 05-045-14054, UIC# 159212

Scott 41D-36-692 SWD, API# 05-045-11169, UIC# 159159

Temporary frac tanks installed on location will have proper secondary containment such as either putting a perimeter berm around location or around the frac tanks.

GENERAL WILDLIFE AND ENVIRONMENTAL PROTECTION MEASURES

Establish policies to protect wildlife (e.g., no poaching, no firearms, no dogs on location, no feeding of wildlife, etc.)

Promptly report spills that affect wildlife to the Water Quality Control Division of CDPHE and CDOW

Avoid location staging, refueling, and storage areas within 300 feet, of any reservoir, lake, wetland, or natural perennial or seasonal flowing stream or river.

Bear proof dumpsters and trash receptacles for food-related trash at all facilities that generate such trash will be installed and utilized

INFRASTRUCTURE LAYOUT WILDLIFE PROTECTION MEASURES

Implementing fugitive dust control measures

Limit parking to disturbed areas as much as possible

DRILLING AND PRODUCTION OPERATION WILDLIFE PROTECTION MEASURES

Reduce visits to well-sites through remote monitoring (i.e. SCADA) and the use of multifunction contractors, where practicable.

Install exclusionary device to prevent bird and other wildlife access to equipment stacks, vents and openings.

Establish company guidelines to minimize wildlife mortality from vehicle collision on roads.

FLUID PIT/POND WILDLIFE PROTECTION MEASURES

Install and maintain adequate measures to exclude all types of wildlife (e.g., big game and birds) from all fluid pits/ponds with fencing, flagging and other appropriate exclusion measures). BBC currently installs 6' wildlife proof fences on all pits and freshwater ponds with free liquids. In addition, BBC will install bird netting over "inactive" pits with free liquids after 30 days of inactivity.

INVASIVE/NON-NATIVE VEGETATION CONTROL

Educate employees and contractors about noxious and invasive weed issues.

RESTORATION, RECLAMATION AND ABANDONMENT

Avoid aggressive non-native grasses and shrubs in mule deer and elk habitat restorations.

Revegetate with seed mixtures that are of the surface owner's preference that are compatible with both livestock and wildlife.

BBC STORM WATER AND SPILL CONTROL PRACTICES

GENERAL

Utilize diking and other forms of containment and diversions around tanks, drums, chemicals, liquids, pits, impoundments, or well pads

Use drip pans, sumps, or liners where appropriate

Limit the amount of land disturbed during construction of pad, access road, and facilities

Employ spill response plan (SPCC) for all facilities

Dispose properly offsite any wastes fluids and other materials

MATERIAL HANDLING, ACTIVITIES, PRACTICES AND STORM WATER DIVERSION

Secondary containment of tanks, drums, and storage areas is mandatory to prohibit discharges to surface waters. A minimum of 110% capacity required of largest storage tank within a containment area

Material handling and spill prevention procedures and practices will be followed to help prohibit discharges to surface waters

Proper loading, and transportation procedures to be followed for all materials to and from locations

EROSION CONTROL

Pad and access road to be designed to minimize erosion

Pad and access road to implement appropriate erosion control devices where necessary to minimize erosion

Routine inspections of sites and controls to be implemented with additions, repairs, and optimization to occur as necessary to minimize erosion

SELF INSPECTION, MAINTENANCE, AND HOUSEKEEPING

All employees are trained in spill response, good housekeeping, material management practices, and procedures for equipment and container washing annually

Conduct internal storm water inspections per applicable stormwater regulations

Conduct routine informal inspections of all tanks and storage facilities at least weekly

All containment areas are to be inspected weekly or following a heavy rain event.

Any excessive precipitation accumulation within containment should be removed as appropriate and disposed of properly

All structural berms, dikes, and containment will be inspected periodically to ensure they are operating correctly

SPILL RESPONSE

Spill response procedures as per the BBC field SPCC Plan

VEHICLE & LOCATION PROCEDURES

Vehicles entering location are to be free of chemical, oil, mud, weeds, trash, and debris

Location to be treated to kill weeds and bladed when necessary

Bill Barrett Corp. – CDPHE Stormwater Permit Number: COR-039752

Based on the information provided in the Form 2A by Bill Barrett, COGCC will attach these BMPs to the Form 2A permit. Bill Barrett does not need to respond, unless Bill Barrett has questions or concerns with details in this email. If you have any questions regarding this email, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG **Oil and Gas Location Assessment Specialist**

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