

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Friday, March 30, 2012 12:40 PM
To: Kubeczko, Dave
Subject: FW: Barrett Well 21A-36-692 BMPs
Attachments: BBC Standard APD BMPs.pdf

Categories: Orange - Operator Correspondence, Dark Green - CDOW Pass

Scan No 2034285 CORRESPONDENCE 2A#400258678

From: Buchholz, William
Sent: Monday, March 12, 2012 1:22 PM
To: Kubeczko, Dave
Cc: Warren, Michael
Subject: FW: Barrett Well 21A-36-692 BMPs

Dave,

I received the attachment of BMPs from BBC regarding Barrett Site 21A-36-692. I will reference it in my 2A comments for this site.

I left you a voice message a while ago asking for the COGCC POC who people would call (in our region) if they had a complaint with an oil and gas operation. Do you know who the person(s) is/are for the NW Region, or a way that I can find out?

Thanks.

Bill Buchholz
Land Use Specialist
Colorado Division of Parks & Wildlife
Grand Junction, CO 81505
970-255-6127
william.buchholz@state.co.us

From: Brady Riley [<mailto:briley@billbarrettcorp.com>]
Sent: Monday, March 12, 2012 12:17 PM
To: Buchholz, William
Cc: Warren, Michael
Subject: RE: Barrett Well 21A-36-692 BMPs

Bill,

Per your request, see page 3 of the attached document for Wildlife BMPs.

Please let me know if you have additional questions!

Thanks,

Brady Riley

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From: Buchholz, William [<mailto:William.Buchholz@state.co.us>]

Sent: Friday, March 09, 2012 1:18 PM

To: Brady Riley

Cc: Warren, Michael

Subject: Barrett Well 21A-36-692 BMPs

Hi Brady,

It was nice talking to you today. Please send any BMPs you would like to reference for this well site to me on Monday so I can reference them in my COGCC 2A comments. If you want to discuss the effort or any of the BMPs, please give me a call.

Thank you!

Bill Buchholz

Land Use Specialist
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BBC GENERAL PRACTICES

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 directed into a 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 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 according to SPCC regulations such as either putting a perimeter berm around location or around the frac tanks.

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

BBC WILDLIFE BEST MANAGEMENT PRACTICES

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.

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.