From: Keith Caplan
To: "Greg Deranleau - DNR"
Subject: RE: Antelope T-18 Pad Form 2A doc #400499900
Date: Monday, December 23, 2013 12:31:48 PM

I agree to the proposed COA.

Keith S. Caplan
(720) 440-6112

From: Greg Deranleau - DNR [mailto:Greg.Deranleau@state.co.us]
Sent: Monday, December 23, 2013 12:28 PM
To: Keith Caplan
Subject: RE: Antelope T-18 Pad Form 2A doc #400499900

Thank Keith.

I realized as I went to paste these in that COA #10 should not have the reference to BMPs for nearby surface water. I would like COA #10 to read:
"Operator shall develop a Contingency Plan for any LVST 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."

Thanks.

Greg Deranleau
Oil & Gas Location Assessment Supervisor
Colorado Oil and Gas Conservation Commission
303-894-2100 ext. 5153

From: Keith Caplan [mailto:KCaplan@bonanzacrk.com]
Sent: Monday, December 23, 2013 9:54 AM
To: 'Greg Deranleau - DNR'
Subject: RE: Antelope T-18 Pad Form 2A doc #400499900

Bonanza agrees to the proposed COAs.

Thank you ,
Keith S. Caplan
(720) 440-6112

From: Greg Deranleau - DNR [mailto:Greg.Deranleau@state.co.us]
Sent: Friday, December 20, 2013 2:20 PM
To: Keith Caplan
Subject: Antelope T-18 Pad Form 2A doc #400499900

Keith,
COGCC is reviewing the above referenced Form 2A.

The following COAs have been developed for the use of Temporary Large Volume Storage Tanks (TLVST):

1. TLVSTs 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. TLVSTs shall be constructed and operated in accordance with a design certified by a Colorado Licensed Professional Engineer.

3. TLVSTs shall not be located on non-engineered fill material. Subgrade preparation shall be verified by proof-rolling prior to installation of TLVST.

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 TLVSTs.

5. All TLVST 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 each TLVST to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.

7. TLVSTs shall be operated with a minimum of 1 foot freeboard.

8. Operator shall be onsite and inspect for leaks during the initial filling of TLVST. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the tank evaluated.

9. Once in operation, TLVST shall be inspected daily and any deficiencies repaired as soon as practicable.

10. Operator shall develop a Contingency Plan for any LVST 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 (BMPs) shall be employed to prevent injuries, property damage or environmental impacts, such as erosion of onsite sediment into nearby surface water.

11. Should a failure of TLVST 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.

No other COAs or clarifications are required at this time. With your consent, the above COAs will be applied to this Form 2A and the OGLA task passed.

Please let me know if you have any questions.

Greg Deranleau
Oil and Gas Location Assessment Supervisor

Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203
303-894-2100, ext 5153

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