



## **PDC Energy Site-Specific Temporary Modular Large Volume Tank Contingency Plan**

The purpose of this Temporary Modular Large Volume Tank (MLVT) Contingency Plan is to outline some of the site-specific considerations to take in to account before MLVT construction and also to define the response actions required in the event of a release from a MLVT. This contingency plan is intended to provide guidance to PDC and its contractors in terms of identifying risks and what is required for response actions to a MLVT release. It is not intended to replace any part of the required PDC Energy MLVT construction checklist or the tank manufacturer's standard operation procedures; it is intended only as supplemental and informational to these. In addition, MLVT's used on PDC locations shall comply with the COGCC Policy on the Use of Temporary Large Volume Storage Tanks in Colorado (see Appendix A).

Upon consideration of the risks at each location it may be determined that a MLVT may not be suitable for use without implementation of additional risk reduction methods (e.g., additional berming, trenching, etc.) or it may be necessary to identify an alternative method of water storage other than a MLVT. The additional risk reduction methods will need to be determined on an individual basis.

Each location where MLVT's are used will have its own set of unique site-specific characteristics and associated risks (e.g., rural vs. urban setting, grade of the location, etc.) to be considered in a worst case scenario. These characteristics must be identified and addressed prior to the MLVT construction phase and should be documented in the MLVT construction checklist. Ensuring the safety of our employees, contractors, and the public are a top priority. This can be addressed with the implementation of MLVT pre-construction risk assessment measures to address safety concerns, and minimize environmental impacts and property damage in the unlikely event of a MLVT release.

### **Pre-Construction Considerations**

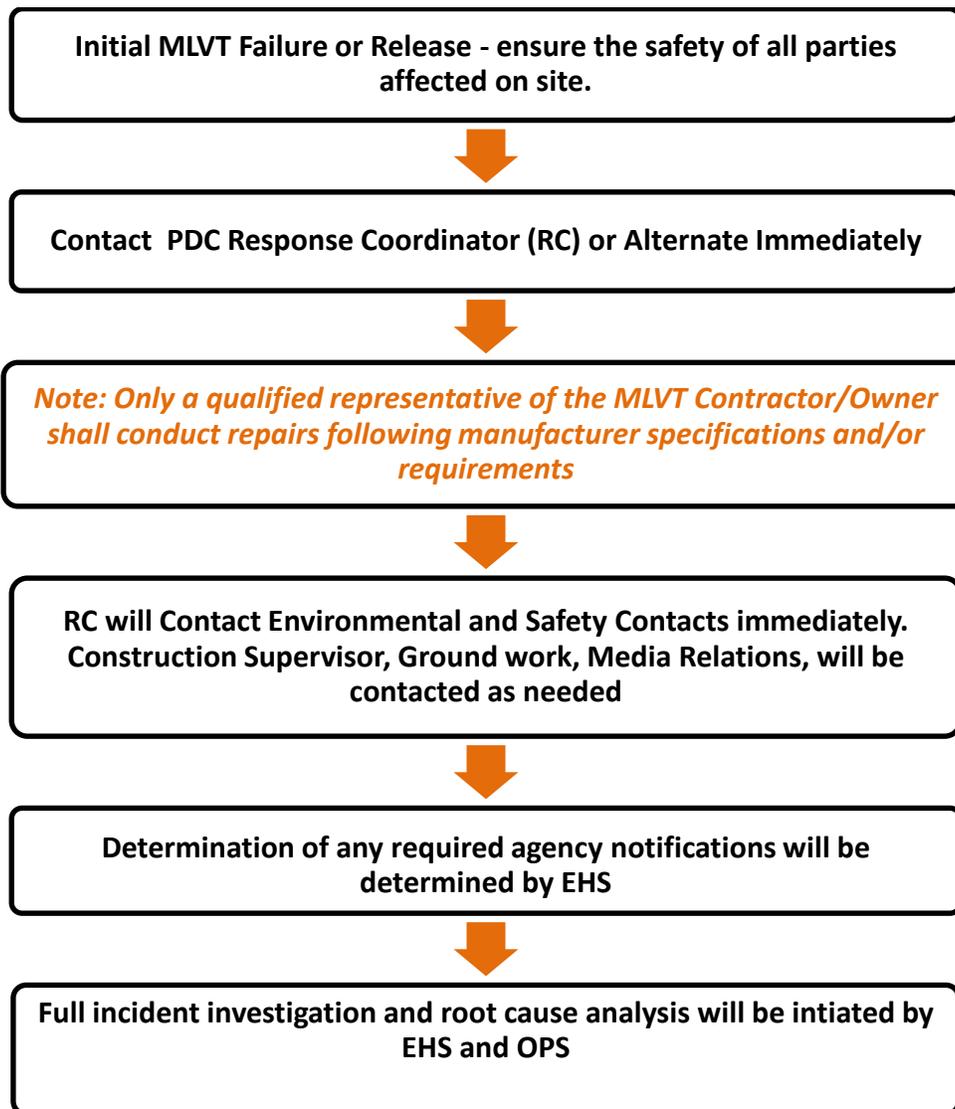
- Topography
  - High, Low, Slope, Direction
- Buildings (houses or others) and their locations; up gradient, down gradient
- Local Roads and traffic
- Surface waters
  - (Proximity to streams, canals, lakes/ponds) and location; (up gradient, down gradient)
- Site visibility must be adequate
  - Night lighting, reflective tape where needed, etc.
- Other equipment on location
- Surrounding land use
  - Agriculture, urban, barren, industrial, etc.
- Traffic onsite must be controlled and managed to maintain tank security
  - Use of barriers, signs directing traffic so everyone knows where to go
- Tear away tank fill connections must be used
- Check valves must be used for anti-siphon prevention
- Site security

## Response Actions for MLVT Release

In the event of MLVT release, whether a liner failure, tank structure failure, etc. it is critical that prompt response actions are understood and taken to ensure the safety of our employees and the public, and to minimize environmental impacts and property damages. **The PDC Energy Response Coordinator (identified in the contacts below) shall immediately notify an EHS environmental or safety contact upon learning of any tank failure or release.** EHS will then determine if any agency notifications need to be made and initiate a complete incident investigation and root cause analysis with all parties involved for any tank failure or release, regardless of magnitude (including small leaks and repairs).

The following is a flow chart of response actions followed by a list of PDC Energy contacts:

### MLVT Failure Response Actions



<b>PDC Energy, Inc.</b>	
<b>QUICK REFERENCE MLVT CONTACT AND REPORTING TABLE</b>	
<b>PDC Energy MLVT Response Coordinator</b>	<b>PDC Energy MLVT Response Coordinator - Alternate Contact</b>
<i>Lead Completions Supervisor Mike Schweizer (970-215-5608)</i>	<i>District Operations Manager Jason Miller (970-396-8867)</i>
<b>Environmental Contact</b>	<b>Safety Contact</b>
<i>District EHS Professional – Environmental Brandon Bruns (720-281-7255) or Troy Swain (970-381-2019)</i>	<i>District EHS Professional – Safety Jason Thron (970-373-9267)</i>
<b>Construction Supervisor</b>	<b>Ground Work</b>
<i>Construction Supervisor or Field Project Supervisor Mark Longhurst (970-301-8294)</i>	<i>District Well Location and Development Reclamation Supervisor Aaron Clyncke (970-568-6717)</i>