

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

**COGCC Form 2A review of Bill Barrett Corp's Ruh 6-62-11\_14 NWNE location - Doc #400578505**

2 messages

**Andrews - DNR, Doug** <doug.andrews@state.co.us>

Thu, Apr 3, 2014 at 10:56 AM

To: Mary Pobuda &lt;mpobuda@billbarrettcorp.com&gt;

Mary,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) Your pipeline description indicates there will be one gas pipeline, one water line, and one residue line installed. However, there will be four wells at this location along with 12 tanks, 7 separators, 1 gas compressor, a pigging station, etc, and you will also be producing the fluids from the nearby four well Ruh pad to the east. It seems unlikely that only one gas, one water, and one residue line will handle all the fluids from all eight wells to all the production facilities. Please provide a revised count of all the proposed oil, gas, and/or water pipelines that will be on this proposed oil and gas location.
- 2) Because the property line distance in the Cultural section is used to indicate compliance with 150 foot setback from a wellhead, I would like to change this distance. Please provide me with the distance of the nearest well to the property line and I will change it on the Form 2A.
- 3) Because there will be temporary large volume storage tanks (MLVTs) utilized at this proposed oil and gas location, I would like to add the following Conditions of Approval:
  1. MLVTs 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. MLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
  3. Site preparation and MLVT installation oversight shall be provided by a manufacturer representative either designated or otherwise certified to affirm that the site preparation and MLVT installation was completed in accordance with design specifications. Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications.
  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 MLVTs.
  5. All MLVT 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 the MLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
  7. MLVTs shall be operated with a minimum of 1 foot freeboard.
  8. Operator shall be onsite and inspect for leaks during the initial filling of the MLVT. If leaks are observed, filling shall cease and the leaks be repaired and the integrity of the

tank evaluated.

9. Once in operation, the MLVT shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the MLVT shall be limited to operational personnel.
11. Operators employing MLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Should a failure of MLVT 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.

Please respond to this correspondence by May 3, 2014. If you have any questions, please feel free to contact me. Thank you.

—

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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**Mary Pobuda** <[mpobuda@billbarrettcorp.com](mailto:mpobuda@billbarrettcorp.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>  
Cc: Tracey Fallang <[tfallang@billbarrettcorp.com](mailto:tfallang@billbarrettcorp.com)>

Wed, Apr 9, 2014 at 1:29 PM

Hi Doug,

Please see my comments below in red and let me know if you have any questions.

Thank you.

**Mary Pobuda**

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Permit Analyst

**Bill Barrett Corporation**

1099 18<sup>th</sup> Street Ste 2300

Denver CO 80202

303-312-8511 direct | 720-402-7539 cell

[mpobuda@billbarrettcorp.com](mailto:mpobuda@billbarrettcorp.com)



**Bill Barrett Corporation**

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]

**Sent:** Thursday, April 03, 2014 10:57 AM

**To:** Mary Pobuda

**Subject:** COGCC Form 2A review of Bill Barrett Corp's Ruh 6-62-11\_14 NWNE location - Doc #400578505

Mary,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

- 1) Your pipeline description indicates there will be one gas pipeline, one water line, and one residue line installed. However, there will be four wells at this location along with 12 tanks, 7 separators, 1 gas compressor, a pigging station, etc, and you will also be producing the fluids from the nearby four well Ruh pad to the east. It seems unlikely that only one gas, one water, and one residue line will handle all the fluids from all eight wells to all the production facilities. Please provide a revised count of all the proposed oil, gas, and/or water pipelines that will be on this proposed oil and gas location. **4 Gas Pipelines (2" steel), 4 Water Pipelines (3" steel), 4 Oil Pipelines (3" steel), 4 Injection Pipelines (4" steel), 4 flowlines (4" steel).** When possible temporary water pipelines will carry water from storage tanks or water sources to well completion sites. Pipes will be made of flexible and rigid materials (plastic, aluminum and steel) generally 8" to 12" in diameter. The length will be determined by the distance to the well site to be serviced for the fracing operation. This will greatly minimize the number of truck trips required for the well completion.
- 2) Because the property line distance in the Cultural section is used to indicate compliance with 150 foot setback from a wellhead, I would like to change this distance. Please provide me with the distance of the nearest well to the property line and I will change it on the Form 2A. **250 feet**
- 3) Because there will be temporary large volume storage tanks (MLVTs) utilized at this proposed oil and gas location, I would like to add the following Conditions of Approval: **Ok, would you also add the following comment to the 2A:" This location will have 2 temporary LVST's and 10-500 bbl frac tanks OR up to 110-500 bbl frac tanks. Frac tanks located on this pad may service completion operations being conducted on an adjacent pad location. A sundry would be submitted in the event this situation occurs. Surface owner approval would be obtained where necessary".**

1. MLVTs 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. MLVTs shall be constructed and operated in accordance with a design certified and sealed by a Colorado Licensed Professional Engineer.
3. Site preparation and MLVT installation oversight shall be provided by a manufacturer representative either designated or otherwise certified to affirm that the site preparation and MLVT installation was completed in accordance with design specifications.  
Construction and installation of the tank structure, liner and sub-grade shall meet or exceed the manufacturer specifications.
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 MLVTs.
5. All MLVT 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 the MLVT to indicate contents are freshwater and that no E&P waste fluids are allowed. Location and additional signage shall conform to Rule 210.
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9. Once in operation, the MLVT shall be inspected daily and any deficiencies repaired as soon as practicable.
10. Access to the MLVT shall be limited to operational personnel.
11. Operators employing MLVTs on their Oil & Gas Locations shall develop and comply with a written standard operating procedure.
12. Should a failure of MLVT 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.

Please respond to this correspondence by May 3, 2014. If you have any questions, please feel free to contact me. Thank you.

—

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



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