

STATE OF
COLORADO

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

COGCC Form 2A review of PDC Energy's Suden 34U-HZ Pad - Location ID #400551023

2 messages

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

Mon, Jun 9, 2014 at 9:30 AM

To: Liz Lindow <liz.lindow@pdce.com>

Liz,

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

- 1) Because this oil and gas location will have four wells on it, a Multi-Well Plan is a required attachment. Please send me the Multi-Well Plan for this oil and gas location.
- 2) While you have provided a BMP on general dust control at this oil and gas location, given the proximity of the nearest Building Unit, please also provide a BMP on how PDC will manage and control silica dust when handling sand used in hydraulic fracturing operations.
- 3) While you have included several BMPs concerning the use of MLVTs at this location, I would like to add the following Conditions of Approval based on the final MLVT Policy of May 29, 2014:
 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. The MLVT shall be constructed and operated in accordance with a design package certified and sealed by a Licensed Professional Engineer either in Colorado or the state where the MLVT was designed or manufactured.
 3. COGCC Rules 605.a.(3,5,6,7, and 8), as applicable to tank setbacks at the time of installation shall apply to the siting of this MLVT.
 4. All MLVT liner seams shall be welded and tested in accordance with applicable ASTM international standards. Any repairs to liners shall be made using acceptable practices and applicable standards.

Please respond to this correspondence by July 9, 2014. If you have any questions, please contact me. Thank you.

—

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area

**COLORADO**
Oil & Gas Conservation
Commission
Department of Natural Resources


1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us
303-894-2100 Ext. 5180

Liz Lindow <Liz.Lindow@pdce.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Mon, Jun 9, 2014 at 3:35 PM

See comments below in RED.

 Liz Lindow | Regulatory Analyst (Progressive Consulting) | Consultant for PDC Energy | O: [303-831-3974](tel:303-831-3974) | F: [303-860-5838](tel:303-860-5838) | liz.lindow@pdce.com

From: Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]
Sent: Monday, June 09, 2014 9:31 AM
To: Liz Lindow
Subject: COGCC Form 2A review of PDC Energy's Suden 34U-HZ Pad - Location ID #400551023

Liz,

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

1) Because this oil and gas location will have four wells on it, a Multi-Well Plan is a required attachment. Please send me the Multi-Well Plan for this oil and gas location. **Attached.**

2) While you have provided a BMP on general dust control at this oil and gas location, given the proximity of the nearest Building Unit, please also provide a BMP on how PDC will manage and control silica dust when handling sand used in hydraulic fracturing operations.

PDC will employ practices for control of fugitive dust caused by operations include but not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high-wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. When necessary, PDC coordinates dust mitigation with the county on gravel roads, places road base where allowed by surface owner around tanks and wellheads to minimize dust, and will water the roads and locations when dry. In addition, automation is used on all new wells to minimize truck traffic.

3) While you have included several BMPs concerning the use of MLVTs at this location, I would like to add the following Conditions of Approval based on the final MLVT Policy of May 29, 2014: **Approved.**

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.
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certified and sealed by a Licensed Professional Engineer either in Colorado or the state where the MLVT was designed or manufactured.

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Please respond to this correspondence by July 9, 2014. If you have any questions, please contact me. Thank you.

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Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801

Denver, CO 80203

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303-894-2100 Ext. 5180



MULTI WELL_SUDEN 34U-HZ (2014-03-10).pdf

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