

STATE OF
COLORADO

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

COGCC review of Bill Barrett Corp's CB Rudd 6-61-18_19 SW7 location - Doc #400658194

4 messages

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

Mon, Aug 25, 2014 at 10:59 AM

To: Mary Pobuda <mpobuda@billbarrettcorp.com>

Mary,

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

1) You have included an attachment waiving the Rule 305.a.(2), 305.c.(2), and 306.e. notification and meeting requirements. While COGCC Rules do provide for these particular notifications and meetings requirements to be waived, there is no provision in our Rules for waiving the mitigation measures required by Rule 604. Therefore, the mitigation measures listed in Rule 604.c.(2) must be addressed by the Operator on the Form 2A. That being said, some of these mitigation measure can be addressed by indicating the Building Unit owner has no concerns.

Specifically, the 604.c.(2)A - Noise, 604.c.(2)Ei - Multiwell Pads (consolidating wells to create multiwell pads and placing production facilities as far as possible from Building Units), 604.c.(2)M - Fencing Requirements, and 604.c.(2)W - Site Specific Measures mitigation measures. The remaining mitigation measure listed in Rule 604.c.(2) must be addressed individually on the Form 2A. Please provide me with BMPs covering the 604.c.(2) mitigation measures.

2) Is there currently a tenant residing in that closest Building Unit owned by BBC?

3) The nearest water well located approximately 253 from the proposed oil and gas location is permitted as a Domestic water well. By definition when a Domestic water well is present within 1/8-mile (660 feet) of an oil and gas location, that location is considered to be a Sensitive Area. Therefore, I will change the Sensitive Area designation from NO to YES in the Water Resources section.

Please respond to this correspondence by September 25, 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

Mary Pobuda <mpobuda@billbarrettcorp.com>

Wed, Aug 27, 2014 at 12:02 PM

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

Hi Doug, does this suffice for inclusion for no. 1 and no. 2 below?

Bill Barrett is the building unit owner of this property. No tenants reside in the building and BBC is moving forward with the use by special review process with the county to allow for the building unit to be utilized as office space as necessary.

Noise.	BBC is the building unit owner; no concerns or mitigation necessary.
Closed Loop Drilling Systems – Pit Restrictions.	A closed loop drilling system will be utilized.
Green Completions – Emission Control Systems.	Green completion practices will be employed.
Traffic Plan.	Access road is existing, Weld county doesn't require an encroachment permit for this location.
Multiwell Pads.	BBC is the building unit owner; no concerns or mitigation necessary. This is also a single well pad.
	-Employ a spill response plan (SPCC) for all facilities.

Leak Detection Plan.	-Conduct routine informal inspections of all tanks and storage facilities at least weekly. -Tank batteries would be placed within secondary containment consisting of corrugated steel containment rings and sized to provide containment for 150% of the largest single tank.
Berm construction.	Berms to be constructed as per rule requirements.
Blowout preventer equipment ("BOPE").	BBC is the building unit owner and the building is unoccupied. BOP equipment will be utilized as per requirements.
BOPE testing for drilling operations.	BBC is the building unit owner and the building is unoccupied, and is not anticipated to be occupied during drilling operations. Adequate equipment will be utilized as per rule requirements.
BOPE for well servicing operations.	BBC is the building unit owner and the building is unoccupied, and is not anticipated to be occupied during well servicing operations. Adequate equipment will be utilized as per rule requirements.
Pit level indicators	No pits are planned for this location.
Drill stem tests.	Not planned.
Fencing requirements.	BBC is the building unit owner, no fencing proposed.
Control of fire hazards.	Fire hazards not in use to be a minimum of 25' from wellhead, tanks and separator.
Loadlines.	Loadlines to be bullplugged or capped.
Removal of surface trash.	Trash would be contained in a trash cage and hauled away to an approved disposal.
Guy line anchors.	Anchors to be identified as required by 604c(2)(Q)
Tank specifications.	Tanks will meet NFPA standards.
Access roads.	BBC is the building unit owner; no concerns or mitigation necessary. Access road is existing.
Well site cleared	BBC to follow Rule 1004a which requires all equipment to be removed within 90 days of plugging a well.
Identification of plugged and abandoned wells.	BBC to follow Rule 319a(5), requiring identification of P&Ad wells with a permanent monument.
Development from existing well pads	BBC is the building unit owner; no concerns.
Site-specific measures.	BBC is the building unit owner; no concerns or additional mitigation to provide.

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

Sent: Monday, August 25, 2014 11:00 AM

To: Mary Pobuda

Subject: COGCC review of Bill Barrett Corp's CB Rudd 6-61-18_19 SW7 location - Doc #400658194

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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Mary Pobuda <mpobuda@billbarrettcorp.com>

Wed, Aug 27, 2014 at 2:15 PM

Mary,

The BMP for Green Completions - Emission Controls is lacking in detail. Its not enough to say they will be employed, we want to know

9/2/2014

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specifically how. Emission Controls are something we are particularly concerned that Operators provide a good detailed BMP on as the cumulative effects of emissions statewide from oil and gas operations is coming under increased scrutiny.

[Quoted text hidden]

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

Fri, Aug 29, 2014 at 12:37 PM

Hi Doug,

Here's the Green Completions BMP with a little more detail for you....

BBC is the building unit owner; during flowback operations BBC will follow this general procedure:

- Wells will flowback to open top tanks during drillout until sufficient gas pressure is present to allow proper operation of a 3-phase flowback separator
- Fluid from flowback separators will dump water/oil to a PT tank; water will dump to closed top frac tanks equipped with a vapor combustor (vapor combustor will have auxiliary fuel to maintain pilot)
- PT tank will dump oil to BBC production equipment
- Flash vapors off of PT tank will be combusted in flow back flare which will also be equipped with auxiliary fuel
- Once gas rate exceeds 200 mcf/d off of any Well all flow will be diverted to BBC production equipment and ultimately into a gas gathering system

Mary

303.312.8511

From: Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]
Sent: Wednesday, August 27, 2014 2:16 PM
To: Mary Pobuda
Subject: Re: COGCC review of Bill Barrett Corp's CB Rudd 6-61-18_19 SW7 location - Doc #400658194

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