

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
401203031  
Date Received:  
02/06/2017

FIR RESOLUTION FORM

CA Summary:  
1 of 1 CAs from the FIR responded to on this Form  
0 CA Completed  
1 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 69175  
Name of Operator: PDC ENERGY INC  
Address: 1775 SHERMAN STREET - STE 3000  
City: DENVER State: CO Zip: 80203  
Contact Name and Telephone:  
Name:  
Phone: ( ) Fax: ( )  
Email:

Additional Operator Contact:

Contact Name	Phone	Email
<u>Cynthia Stowell</u>	<u>303-886-0883</u>	<u>cogccinspection@pdce.com</u>
<u>Randall Ferguson</u>	<u>303-831-3904</u>	<u>randall.ferguson@pdce.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 684903058  
Inspection Date: 02/01/2017 FIR Submit Date: 02/01/2017 FIR Status:

Inspected Operator Information:

Company Name: PDC ENERGY INC Company Number: 69175  
Address: 1775 SHERMAN STREET - STE 3000  
City: DENVER State: CO Zip: 80203

LOCATION - Location ID: 336012

Location Name: KIRBY-61N67W Number: 36NWSE County:  
Qtrqtr: NWSE Sec: 36 Twp: 1N Range: 67W Meridian: 6  
Latitude: 40.006039 Longitude: -104.837200

FACILITY - API Number: 05-123-00 Facility ID: 336012

Facility Name: KIRBY-61N67W Number: 36NWSE  
Qtrqtr: NWSE Sec: 36 Twp: 1N Range: 67W Meridian: 6  
Latitude: 40.006039 Longitude: -104.837200

CORRECTIVE ACTIONS:

1  CA# 63481

Corrective Action: Location is within a floodplain, containment berms around the tanks must be made of steel or another engineer equivalent per Rule 603.h.(2)C. Refer to the 603.h guidance document for further details.

Date: 03/03/2017

Response: FACTUAL REVIEW REQUEST

Basis for Review: Action requested was already completed prior to the inspection

On February 1, 2016 PDC submitted a Form 4 – Sundry Noticerequesting a variance from the Rule 603.h.

Operator Comment: statewide floodplain requirements for implementing alternative engineering techniques on earthen berms at certain existing tank batteries. The Form 4 was approved by the COGCC on February 18, 2016 (see Document #400982056). Attachments to the Sundry Notice included a cover letter (Document #400982093), a list of the 59 tank batteries with earthen berms (Document #400982148), and a plan view and front, side and top views of the proposed alternative engineered technology (Document #400982149). The Kirby 33-36 well was drilled and completed in 1995 and Kirby 43-36 well was drilled and completed in 2006. The associated production facility was included in the list of 59 tank batteries which was approved by the COGCC for installation of the alternative engineered technology.

COGCC Decision: Approved \_\_\_\_\_

COGCC Representative: Documents submitted by inspector show that berms in floodplain are engineered appropriately for floodplain mitigation.

COGCC Supervisor: Documents submitted by inspector show that berms in floodplain are engineered appropriately for floodplain mitigation.

**OPERATOR COMMENT AND SUBMITTAL**

Comment: On February 1, 2016 PDC submitted a Form 4 – Sundry Notice requesting a variance from the Rule 603.h. statewide floodplain requirements for implementing alternative engineering techniques on earthen berms at certain existing tank batteries. The Form 4 was approved by the COGCC on February 18, 2016 (see Document #400982056). Attachments to the Sundry Notice included a cover letter (Document #400982093), a list of the 59 tank batteries with earthen berms (Document #400982148), and a plan view and front, side and top views of the proposed alternative engineered technology (Document #400982149). The Kirby 33-36 well was drilled and completed in 1995 and Kirby 43-36 well was drilled and completed in 2006. The associated production facility was included in the list of 59 tank batteries which was approved by the COGCC for installation of the alternative engineered technology.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Cynthia Stowell Signed: \_\_\_\_\_

Title: EHS Professional Date: 2/6/2017 1:36:37 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b>Document Number</b>	<b>Description</b>
401203031	FIR RESOLUTION SUBMITTED
401203038	Reinforced Berm Design
401203039	Secondary Containment Variance
401203040	Temporary Variance Request_Letter LePore
401203042	Sundry Approval

Total Attach: 5 Files