



STATE OF  
COLORADO

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

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**RE: [EXTERNAL] :COGCC Amended Form 2A review for PDC Energy's Elbert 3-16 location - Doc #401184118**

3 messages

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**Venessa Chase** <Venessa.Chase@pdce.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Thu, Feb 23, 2017 at 12:39 PM

Hi Doug,

Please see my comments below.

Thank you!

Venessa

**From:** Andrews - DNR, Doug [mailto:doug.andrews@state.co.us]  
**Sent:** Thursday, February 23, 2017 10:41 AM  
**To:** Venessa Chase <Venessa.Chase@pdce.com>  
**Subject:** [EXTERNAL] :COGCC Amended Form 2A review for PDC Energy's Elbert 3-16 location - Doc #401184118

Venessa,

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

Because this amended Oil & Gas Location is in a mapped floodplain, please provide Best Management Practices (BMPs) indicating PDC Energy will comply with COGCC Rule 603.h.(1)B concerning remote shut-in of the new wells and Rule 603.h.(2)B concerning anchoring of production equipment.

All new wells will be equipped with remote shut in capabilities accessible from outside the floodplain in which the wellheads are located.

PDC will anchor all equipment at drilling and production sites in geological hazard and

floodplain areas to the extent necessary to resist flotation, collapse, lateral movement, or subsidence.

Please provide a BMP that indicates the temporary water tanks will also have berm construction, floodplain anchoring, and emission control measures like the permanent tanks.

604c.(2).G. Berm Construction: Containment berms shall be constructed of dirt (earth)

with a geosynthetic liner, designed and installed to prevent leakage and resist

degradation from erosion or routine operation. In addition, Flow Through Fencing will

be placed upstream of facilities to block any anticipated flooding. All berms will be visually checked periodically to ensure proper working condition. Secondary containment devices shall be sufficiently impervious to contain any spilled or released material. Due to a down gradient surface water body within 500', tertiary containment (such as an earthen berm or the like), will be installed

around Production Facilities.

Now that the Public Comment period has passed, please send me a letter certifying PDC Energy's compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also include their outcome.

[Attached](#)

Please respond to this correspondence by March 23, 2017. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



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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 **306e Meeting Requirements Certification Letter to Director\_Elbert 1-12.pdf**  
255K

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**Andrews - DNR, Doug** <doug.andrews@state.co.us>  
To: Venessa Chase <Venessa.Chase@pdce.com>

Fri, Feb 24, 2017 at 10:35 AM

Venessa,

Thanks for the BMPs, but I didn't quite get what I am looking for. The Berm Construction BMP you have already included on the 2A. I am looking for an additional BMP that indicates the **temporary water tanks will also have berm construction, floodplain anchoring, and emission control measures like the permanent tanks.**

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



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**Venessa Chase** <Venessa.Chase@pdce.com>  
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Fri, Feb 24, 2017 at 11:12 AM

Sorry Doug!

The temporary water tanks will employ the same berm construction, floodplain anchoring, and emission control measures as the permanent tanks.

Does this work, or are you looking for more detail?

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]  
**Sent:** Friday, February 24, 2017 10:36 AM  
**To:** Venessa Chase <[Venessa.Chase@pdce.com](mailto:Venessa.Chase@pdce.com)>  
**Subject:** Re: [EXTERNAL] :COGCC Amended Form 2A review for PDC Energy's Elbert 3-16 location - Doc #401184118

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