



STATE OF
COLORADO

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

Question RE: NFPA Compliance for Temp Tanks

7 messages

Schindler, Lisa <Lisa.Schindler@anadarko.com>

Wed, Jun 26, 2019 at 3:56 PM

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

Cc: "VanShura, Jayson" <Jayson.VanShura@anadarko.com>, "Piekara, John" <John.Piekara@anadarko.com>

Hi Doug:

Thanks for the message letting me know about Greg's question RE: NFPA Code 30 compliance for our temporary water tanks. I've spoken with our facilities engineering team, and they suspect that our temporary water tanks are compliant with NFPA Code 30, but are pulling the engineering specs to be certain. We may have to check in with the rental company as well. We hope to have an answer to you by the end of the day today, but it might be tomorrow.

Please let us know if anything else comes up. Thanks for all your assistance with this location,

[Lisa Schindler](#)

Staff Regulatory Analyst

[Anadarko Petroleum Corporation](#)

1099 18th Street | Suite 1800

Denver, CO 80202

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Schindler, Lisa <Lisa.Schindler@anadarko.com>

Fri, Jun 28, 2019 at 7:25 AM

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

Cc: "VanShura, Jayson" <Jayson.VanShura@anadarko.com>, "Piekara, John" <John.Piekara@anadarko.com>

Hi Doug:

According to our engineering team, NFPA Code 30 was written to address crude and condensate storage, but was not written to address tanks containing produced water (based on the NFPA's differing classifications for flammable liquids). That being said, our temporary produced water tanks are likely compliant with a different section of NFPA standards, or certainly some other fire safety standards. We are working to determine what the applicable safety standards may be, and will let you know when we find out more.

Thanks and we will follow up soon,

Lisa

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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Fri, Jun 28, 2019 at 9:20 AM

Greg,

I'm taking some Annual Leave today, but wanted to forward you this email reply from Lisa Schindler with Kerr McGee concerning the NFPA rating for the temporary water tanks on their Jodster South pad to keep you up to date seeing as how you'll be on vacation next week.

Wow, that is a crazy long run-on sentence. Sorry.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

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VanShura, Jayson <Jayson.VanShura@anadarko.com>
To: "Schindler, Lisa" <Lisa.Schindler@anadarko.com>, "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: "Piekara, John" <John.Piekara@anadarko.com>

Fri, Jun 28, 2019 at 9:22 AM

Doug,

Thank you for your patience with this request. Do you have any indication from Greg that this answer will suffice, or will more detail be required? Any insight would be helpful!

Jayson

Jayson VanShura
Regulatory Manager – DJ Basin Permitting
Anadarko Petroleum Corporation
Office: 720.929.6814
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Schindler, Lisa <Lisa.Schindler@anadarko.com>

Mon, Jul 1, 2019 at 11:59 AM

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

Cc: "Piekara, John" <John.Piekara@anadarko.com>, "VanShura, Jayson" <Jayson.VanShura@anadarko.com>

Good morning Doug and John:

Thank you for being patient while we investigated the applicable safety standards for the temporary water tanks with our engineering teams. After extensive internal research with our technical teams and 3rd party engineering firm, we believe our temporary water tanks would adhere to the following portions of the NFPA Code 30 (2008):

- Temporary Water Tanks are built to engineering standards using noncombustible materials, with relief device sizing based on API 2000 standards.
- Temporary Water Tanks are inspected and maintained while in use.
- The only pipes within the containment are related to the temporary tanks (i.e. no external piping is co-located within the containment), and firefighting equipment is likewise not stored within the containment area.

We asked our 3rd party facilities engineering team to weigh in, and have included their observations:

- Produced water is not specifically identified in the liquid classifications addressed by NFPA Code 30

Our staff did some additional research into characteristics of produced water and found the following:

- The flash associated with the produced water is flammable.
- The produced water as it arrives at the tank is flashing as soon as it gets there at about any temperature.
- Produced water's boiling point is ~212F, which is very high and "less/not very flammable" from NFPA 30's point of view.

In addition to the statements made above, temporary water tanks would also be managed as follows:

- Temporary Water Tanks are monitored through a combination of automation and regularly scheduled site visits.
- Temporary Water Tanks will be placed as shown in the facility diagram, and are therefore compliant with minimum safety setbacks of 75' or more from wellheads and 25' or more from any material that might be deemed a fire hazard.

We hope that the above research is sufficient to address Greg Deranleau's question. Please let us know if there is any additional information we should be providing.

Thanks,

Lisa

From: Schindler, Lisa

Sent: Friday, June 28, 2019 7:25 AM

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VanShura, Jayson <Jayson.VanShura@anadarko.com>

Mon, Jul 1, 2019 at 12:11 PM

To: "Schindler, Lisa" <Lisa.Schindler@anadarko.com>, "Noto - DNR, John" <john.noto@state.co.us>, "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Cc: "Piekara, John" <John.Piekara@anadarko.com>

Per the Jodster 2A (401779724), it was requested we submit a BMP and we are looking for guidance as to what you are looking for temp tanks. We appreciate your guidance and expertise as we try to move this across the finish line.

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Schindler, Lisa <Lisa.Schindler@anadarko.com>

Tue, Jul 2, 2019 at 10:34 AM

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

Cc: "Piekara, John" <John.Piekara@anadarko.com>, "VanShura, Jayson" <Jayson.VanShura@anadarko.com>

Good morning Doug:

Per our conversation, please add the following BMP to our Jodster 2A (Doc ID 401779724):

604.c.(2)R BMP: temporary water tanks shall be designed, constructed, and maintained in accordance with the following portions of the National Fire Protection Association (NFPA) Code 30 (2008 version):

- Tanks are built to engineering standards using noncombustible materials, with relief device sizing based on API 2000 standards.
- Tanks are inspected and maintained while in use.
- The only pipes within the containment are related to the temporary tanks (i.e. no external piping is co-located within the containment), and firefighting equipment is likewise not stored within the containment area.

Additionally, temporary water tanks will be monitored through a combination of automation and regularly scheduled site visits. Temporary water tanks will be placed as shown in the facility diagram, and are therefore compliant with minimum safety setbacks of 75' or more from wellheads and 25' or more from any material that might be deemed a fire hazard.

Please let us know if you, Director Robbins or Greg Deranleu need any additional information or have any questions about our proposed BMP. Is it possible for the COGCC to approve the Jodster 2A this week? Please let me know if the we can expect approval (or not) as quickly as possible so we can schedule construction operations accordingly. If it's possible for the 2A to be approved this week, we can avoid interruption of our construction and spudder rig schedules, so your assistance is greatly appreciated.

Thank you so much,

Lisa

Lisa Schindler

Staff Regulatory Analyst

Anadarko Petroleum Corporation

1099 18th Street | Suite 1800

7/2/2019

State.co.us Executive Branch Mail - Question RE: NFPA Compliance for Temp Tanks

Denver, CO 80202

Office – 720-929-3091

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From: Schindler, Lisa

Sent: Monday, July 1, 2019 12:00 PM

To: Noto - DNR, John <john.noto@state.co.us>; 'Andrews - DNR, Doug' <doug.andrews@state.co.us>

Cc: Piekara, John <John.Piekara@anadarko.com>; VanShura, Jayson <Jayson.VanShura@anadarko.com>

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