



## Objective Criteria Review Bison Oil and Gas , Freeman 8-62 Pad, Form 2A 401748156

6 messages

**Koepsell - DNR, Arthur** <arthur.koepsell@state.co.us>  
To: awenk@bisonog.com

Wed, Aug 14, 2019 at 1:04 PM

Abigail,

The Freeman 8-62 Pad 2A triggered an Objective Review Criteria because the location will have more than 18 tanks or >5,200 barrels of hydrocarbon or produced liquid storage (48 tanks are proposed). To ensure that spills do not effect the surrounding area the COGCC requests that Bison provide BMPs to line the secondary containment area for the tanks and separators, and provide a BMP for the use of a Supervisory Control and Data Acquisition (SCADA) system that can automatically shut in the wells during an upset condition if one is going to be utilized on the location.

The following BMP was provided by 8 North on the Brandstein pad that recently passed the Objective Criteria Review:

*Tank berms shall be constructed of steel rings with an engineered synthetic liner and designed to contain 150% of the capacity of the largest tank. The engineered secondary containment system will be constructed of a perimeter of walls that are post driven into the ground around a flexible geotextile base. All components will then sprayed with a polyurea liner technology. This liner technology maintains impermeability and puncture resistance under exposure to UV rays, weather extremes, and chemicals commonly encountered in oil and natural gas production, and provides seamless protection. All berms will be visually checked weekly at a minimum to a maximum of daily to ensure proper working condition.*

If Bison is going to construct the Freman pad in the same manner the BMP could be used. If Bison is not going to build the pad in exactly same manner please provide an alternative BMP.

In addition, there are some BMPs that were included in the Freeman 8-62 13 Pad that should be removed or edited because they recite COGCC Rules. The following BMPs or parts of the BMP should be removed:

**General Housekeeping:** ~~804. Visual Impacts: All long term facility structures will be painted a color that enables the facilities to blend in with the natural background color of the landscape, as seen from a viewing distance and location typically used by the public. Maintain appearance with garbage clean-up; a trash bin will be located on site to accumulate waste by the personnel drilling the wells. Site will have unused equipment, trash and junk removed immediately.~~

**Dust Control:** ~~805.c. Operator shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are 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. Additional management practices such as road surfacing, wind breaks and barriers may be used.~~

**Construction:** ~~803. Light sources during all phases of operations will be directed downwards and away from occupied structures where possible. Permanent lighting shall be mounted at compressor stations on a pole or building and directed downward to illuminate key areas within the facility, while minimizing the amount of light projected outside the facility.~~

**Interim Reclamation:** ~~Operator shall be responsible for segregating the topsoil, backfilling, re-compacting, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and shall reclaim such area to be returned to pre-existing conditions as best as possible with control of all noxious weeds.~~

**Odor Mitigation:** ~~805. Oil & gas facilities and equipment shall be operated in such a manner that odors do not constitute a nuisance or hazard to public welfare. Operator will utilize advanced oil based mud systems which target the reduction of aromatics.~~

Please let me know if you have any questions regarding the requested BMPs or changes to existing BMPs.

Thanks,

Arthur

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\Arthur W. Koepsell, P.G.

Environmental Protection Specialist



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**Koepsell - DNR, Arthur** <arthur.koepsell@state.co.us>  
To: asolis@bisonog.com

Wed, Aug 14, 2019 at 1:14 PM

Ariana,

I originally sent the email below to Abigail but it looks like she is on maternity leave. Could you please review the information requested in the email below and get back to me? Please let me know if you have any questions. I can be reached at 303-894-2100 ext 5148.

Thanks,

Arthur

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**Ariana Solis** <asolis@bisonog.com>  
To: "Koepsell - DNR, Arthur" <arthur.koepsell@state.co.us>

Mon, Aug 19, 2019 at 4:55 PM

Hi Arthur,

I apologize for the delay in response.

Regarding a BMP for the secondary tank containment area, we have prepared the following:

*Tank berms shall be constructed of steel walls with an engineered synthetic liner and designed to contain 100% of the capacity of the largest tank (or manifolded tanks) with the addition of rain water from a 25-year 24-hour storm event and 5% additional freeboard to account for any small piping or equipment that may be in*

*containment. The engineered secondary containment system will be constructed of a perimeter of walls that are post driven into the ground around a flexible geotextile base. All components will then be sprayed with a polyurea liner technology. This liner technology maintains impermeability and puncture resistance under exposure to UV rays, weather extremes, and chemicals commonly encountered in oil and natural gas production, and provides seamless protection. All berms will be visually checked weekly at a minimum to a maximum of daily to ensure proper working condition.*

We do employ the use of a SCADA system at our locations as well. Please let me know if the following BMP will be sufficient:

*Operator will employ the use of a Supervisory Control and Data Acquisition (SCADA) system that has the ability to automatically shut in the wells during an upset condition.*

I concur with all of the remaining BMP revisions, or removal, that you have listed. Please remove these from the form 2A, or edit as you see best.

Thank you for consulting with me. Please reach out with any other questions.

Best,



**Ariana Solis**

Regulatory Analyst

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**Koepsell - DNR, Arthur** <arthur.koepsell@state.co.us>  
To: Ariana Solis <asolis@bisonog.com>

Thu, Aug 22, 2019 at 9:09 AM

Ariana,

Were you able to find out if a WOGLA was required for the Freeman 8-62 13 location? I believe that this only outstanding issue with the 2A, so if we can get it taken care of I will be able to present the 2A to the Director for Final Approval.

Thanks,

Arthur

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**Ariana Solis** <asolis@bisonog.com>  
To: "Koepsell - DNR, Arthur" <arthur.koepsell@state.co.us>

Thu, Aug 22, 2019 at 9:17 AM

Hi Arthur,

My apologies- yes, this site does require a WOGLA. The WOGLA was submitted 08/02/2019.

Thank you,

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**Koepsell - DNR, Arthur** <arthur.koepsell@state.co.us>  
To: Ariana Solis <asolis@bisonog.com>

Thu, Aug 22, 2019 at 9:24 AM

Thank you Ariana.

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