



**DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT**  
1555 N. 17<sup>th</sup> Avenue  
Greeley, CO 80631



**Public Health**  
Prevent. Promote. Protect.

Web: <http://www.co.weld.co.us/departments/healthenvironment/>

**Health Administration  
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Tele: 970.304.6410  
Fax: 970.304.6412

**Public Health & Clinical  
Services**  
Tele: 970.304.6420  
Fax: 970.304.6416

**Environmental Health  
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*Our vision: Together with the communities we serve, we are working to make Weld County the healthiest place to live, learn, work and play.*

November 8, 2011

High Sierra Water Services, LLC-  
Conquest Water Services  
Attn: Jim Goddard  
8207 W. 20<sup>th</sup> Street, Suite B  
Greeley, Colorado 80634

Subject: High Sierra Water Services C7 (SWD C7A), 2<sup>nd</sup> Semi-annual Inspection 2011

Dear Mr. Goddard:

On October 13, 2011, the Weld County Dept. of Public Health and Environment conducted a routine inspection of the C7 Class II Injection Well and Recycling Facility, located at 35859 County Road 74, Weld County, Colorado. The purpose of the inspection was to assess the facility's compliance with the approved Use by Special Review Permit Number 1747 (USR-1747) and applicable Weld County Code. Based on the inspection the following needs to be addressed by High Sierra:

Report estimated emissions of Volatile Organic Compounds and Hazardous Air Pollutants. Development Standards 11 & 20 of USR-1747 and Section 23-2-250 of the Weld County Code requires the operation of this use to comply with the air quality regulations promulgated by the Air Quality Control Commission. An Air Pollutant Emission Notice (APEN) and Construction Permit Application must be filed with the Colorado Dept. of Public Health & Environment's Air Pollution Control Division for emissions from the loading rack and oil/condensate tanks. Also, see attached e-mail to Mr. Mark Marcin regarding APEN requirements for acid scrubbers associated with the recycle operation. Please copy your submittal to this Department.

Due to groundwater flow being opposite of the expected direction at initial well placement, additional groundwater monitoring wells need to be sited and completed down gradient of the facility's operations. See attached groundwater elevation map. This matter was discussed via telephone with your consultant, Mr. Craig Mullica with CGRS. Please provide expected date of completion for installation of down gradient groundwater monitoring wells.

The Department will follow-up with High Sierra during the next routine inspection to ensure the above actions are completed. If you have any questions regarding this inspection, please contact me at 304-6415, extension 2219.

Sincerely,

Troy E. Swain  
Waste Program Coordinator  
Environmental Health Services Division

Attachments (4): inspection checklist, photo of unloading pad & PLC readout, groundwater elevation map, August 24, 2011 e-mail to M. Marcin re APEN from HCL Scrubbers)

cc: Denise Onyskiw, COGCC, 1120 Lincoln St., Ste. 801, Denver, CO 80203 (via e-mail)  
Jerry Henderson, CDPHE-HMWMD Solid Waste Unit (via e-mail)



## INJECTION WELL INSPECTION REPORT CHECKLIST

FACILITY OWNER/OPERATOR: High Sierra Water Services, LLC

FACILITY NAME: C-7 (SWD C7A) FACILITY ID: 159346 USR: 1747  
05-123-32207

DATE: 10-13-2011 INSPECTION: Q/SA WELL CLASS: III

CONTACT PERSON: Jim Goddard PHONE: 970-515-7682  
ADDRESS: 8207 W. 20th ST, Ste B 970-515-7681 (fax)  
Greeley CO 80634 970-397-9156 cell (Dan)  
dgarcia@highsierraenergy.com

FACILITY LOCATION: 35859 CR 74  
(69874)

TRUCK DELIVERIES/DAY~ 50-55 BARRELS INJECTED/DAY~ 6500

INJECTION PRESSURE: 880 psi (LIMIT 1410 psi).

SOLIDS/SEDIMENT DISPOSAL NAME: CSI & (WMX dewatered + L. Fill)

PETROLEUM CONTAMINATED SOILS: N/A ON-SITE STORAGE: Y(N)

CONDITION OF CONCRETE RECEIVING PAD: OK

LEAK DETECTION SYSTEM MONITORING: (Y)/N

FREQ/RECORDS: monthly,  
Rec. weekly at 1st.

GROUNDWATER MONITORING WELL CONDITION: \* PLACEMENT REPORTS: (Y)/N  
ISSUES

CHEMICALS STORED: (Y)/N EMERGENCY RELEASES: Y (N) ISDS: (Y)/N

ENVIRONMENTAL SPECIALIST: Troy SWAIN

MIT = 2/11/2011

PERSONS PRESENT AT TIME OF INSPECTION: Dan Garcia 20-13-2011  
Doug Lockhart

CURRENT CONDITIONS/COMMENTS: Inj @ 880 psi, totalizer reading = 479,723 BB

Inj. battery consist of  
10 tanks (1000 BBL largest).

\* Discussed with Craig Muller with  
CGRS (Consultant).

H2O Recycle ops not up  
and running, inj-only @ this time.

\* APEN Ref for Acid tank scrubbers  
& Tank Systems.





2011/10/13











## Troy Swain

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**From:** Troy Swain  
**Sent:** Wednesday, August 24, 2011 2:47 PM  
**To:** 'mmarcin@highsierraenergy.com'  
**Cc:** Kim Ogle; Lauren Light; Phillip Brewer; 'R. K. Hancock'  
**Subject:** RE: HCl scrubber emissions from HCL tanks at injection facilities.

Mark Marcin  
High Sierra Water Services LLC

RE: HCl scrubber emissions from HCL tanks at injection facilities.

Dear Mark, I received a copy of your July 15, 2011 e-mail regarding chemical storage tanks at the injection well facilities that are co-located with the water recycle operations.

An Air Pollutant Emission Notice (APEN) will need to be filed for the hydrochloric acid scrubber emissions. The scrubbers control efficiency should be high, however, emissions reporting level is based on **uncontrolled actual annual emissions**. See following excerpt from Air Quality Control Commission REGULATION NUMBER 3, STATIONARY SOURCE PERMITTING AND AIR POLLUTANT EMISSION NOTICE REQUIREMENTS (5 CCR 1001-5).

### II. Air Pollutant Emission Notice (APEN) Requirements

II.A. Air Pollutant Emission Notices for New, Modified, and Existing Sources: Except as specifically exempted in Section II.D., no person shall allow emission of air pollutants from, or construction, modification or alteration of, any facility, process, or activity which constitutes a stationary source, except residential structures, from which air pollutants are, or are to be, emitted unless and until an Air Pollutant Emission Notice and the associated Air Pollutant Emission Notice fee has been filed with the Division with respect to such emission. Each such notice shall specify the location at which the proposed emission will occur, the name and address of the persons operating and owning such facility, the nature of such facility, process or activity, an estimate of the quantity and composition of the expected emission and other information as required in the current Air Pollutant Emission Notice form.

II.B.3.b. Non-criteria Reportable Pollutants: For non criteria reportable pollutants, Air Pollutant Emission Notices are required for each individual emission point with uncontrolled actual emissions that exceed the de minimis levels as determined following the procedures set forth in Appendix A.

Appendix A: Reporting Threshold for HCL (Scenario 1, Bin A, Hazardous Air Pollutant/Non-criteria reportable air pollutant) is 50 pounds per year.

Compliance with Air Quality Control Commission Regulations is required by your County land use permits and Section 23-2-250 B. of the Weld County Code.

If you have any questions regarding the APEN filing process, please contact the Colorado Air Pollution Control Division at 303-692-3100.

Troy E. Swain  
Environmental Health Specialist  
Weld County Dept. of Public Health & Environment  
1555 N. 17th Avenue  
Greeley, CO 80631  
(970) 304-6415, ext. 2219