



Mr. Dan Valentine
 23085 County Road 43.7
 Aguilar, CO 81020

January 9, 2015

Dear Mr. Valentine,

RE: Complaint 200420837
 CBM well venting/air quality
 Parachute 34-25 (05-071-08408)
 SWSE 25 31S 66W Las Animas County

In response to your concerns regarding gases venting from a coal bed methane well located in a subdivision near your home, the operator was contacted. COGCC contacted the local foreman by phone and the Denver offices of Pioneer by email shortly after your email was received (23 December, 2014). The foreman for the operator reported that they were performing maintenance activities on the Parachute well and that they were venting air from the well bore at the conclusion of the workover process to remove coal fines from the bottom of the well bore. During that workover air enters the well bore and the operator determined that purging the well of air was necessary before putting the well back into production. COGCC rules do allow well venting during maintenance activities without notice to COGCC as quoted below in an excerpt from the 900 series rules covering E&P waste management practices.

"912. VENTING OR FLARING NATURAL GAS

b. Except for gas flared or vented during an upset condition, well maintenance, well stimulation flowback, purging operations, or a productivity test, gas from a well shall be flared or vented only after notice has been given and approval obtained from the Director on a Sundry Notice, Form 4, stating the estimated volume and content of the gas. The notice shall indicate whether the gas contains more than one (1) ppm of hydrogen sulfide. If necessary to protect the public health, safety or welfare, the Director may require the flaring of gas."

In this case there is no finding that the operator violated COGCC rules. I have contacted staff at the CDPHE Air Quality Control Division to review this particular instance of venting.

Should you be unsatisfied with COGCC staff's handling and resolution of your complaint Rule 522.a. (4) allows you as the complainant to file with the Commission an application for an Order Finding Violation pursuant to 503.b.(4). Please contact Peter Gowen (303-894-2100 ext. 5150) in our Denver office if you wish to discuss how you might proceed if you decide to pursue this option. An application for hearing by a complainant shall be filed within forty-five (45) days of the receipt of the Director's written determination.



Sincerely,
Colorado Oil and Gas Conservation Commission

Peter Gintautas, Ph.D.
Environmental Protection Specialist

cc: John Axelson, COGCC Environmental Supervisor
Jennifer Mattox, CDPHE APCD Enforcement
Dave Holland, Pioneer Natural Resources

