

Variance Request

**LINN Operating Inc.
O-29 Centralized E&P Waste
Management Facility**

OA Project No. 014-1565

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RULE 908.b.(5).D VARIANCE REQUEST

O-29 WATER IMPOUNDMENT FACILITY

PIT FACILITY ID: 290544

LOCATION ID: 335836

LINN OPERATING, INC.

SWSE Section 29, T5S, R96W, 6th PM, Garfield County, Colorado

LINN Operating, Inc. (LINN) is requesting a variance to Rule 908.b.(5).D requiring a buffer zone and fire lane, each at least 10 feet in width, around the active treatment areas and within the perimeter fence of a Centralized E&P Waste Management Facility.

The O-29 Water Impoundment Facility is a previously constructed Form 15 impoundment facility. When the pond was originally constructed, no fire lane or buffer zone was required within the fence perimeter. The wildlife fence was built to Colorado Division of Parks and Wildlife (CPW) standards at the top of the water impoundment. LINN feels there is sufficient access to the entire impoundment around the outside of the fence in case of emergency. If Grand Valley Fire Protection District equipment cannot access portions of the impoundment, the fence can be cut and bird netting removed where needed to give access.

The impoundment is on the south edge of the well pad with the fence approximately 12 feet from the edge of the disturbance. Emergency equipment can access the entire perimeter of the impoundment. Removing the fence and reconstructing it is not feasible.

LINN has familiarized the Grand Valley Fire Protection District (GVFPD), the local fire protection agency, with the location, terrain, and any access issues that may be associated with the O-29 Water Impoundment facility. Please see attached correspondence from GVFPD. The District does not have any issues with the variance request. They have the proper equipment to respond to an emergency at this facility. The district is familiar with the location, terrain and conditions and is confident that the facility location is easily accessible using the department's equipment.

Chemicals are not stored at this facility and fire is highly unlikely due to the lack of flammable materials and flammable ground fuels. However, a fire is the most likely emergency scenario. In any event when GVFPD vehicles could not directly access the facility, the District has sufficient hoses to travel the short distance from the perimeter of the facility outside the fence to the impoundment. While the water handling facility does not have the full twenty feet of emergency access and buffer zone within the fence perimeter, all areas of the facility are accessible using hoses from outside the fence. The fencing can be cut if necessary.

LINN has submitted a copy of their Emergency Response Plan with the Form 28 application, detailing how emergencies are managed by LINN.

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GRAND VALLEY FIRE PROTECTION DISTRICT

0124 STONE QUARRY RD
PARACHUTE, CO 81635
PHONE: 285-9119, FAX (970) 285-9748

May 4, 2015

Tilda Evans
Olsson Associates
760 Horizon Dr. Suite 102
Grand Junction, CO 81506
970-263-6015

Re: COGCC Centralized Waste E&P Waste Management Facility permit

Dear Ms. Evans;

I have reviewed the permit information for the COGCC Centralized Waste E&P Waste Management Facility. This is currently Linn Operating O-29 Water Impoundment. This impoundment currently doesn't and cannot have the 10' fire lane around the impoundment. However, the Fire District will approve the change in facility use to the waste water management facility without the fire lane. The Fire District can get around the area in question without the need of the required fire lane. The buffer zone is adequate for the Fire District since the area doesn't have hardly any ground type fuels for fire spread. The Fire District will not require the fire lane or the buffer zone for the O-29 Water impoundment location. If you or anyone has any questions please feel free to contact me at the number above.

Sincerely

Rob Ferguson
GVFPD Deputy Fire Chief

Cc: file

Mission Statement

We, the members of the Grand Valley Fire Protection District, dedicate our efforts to the protection of the lives, property and environment of the citizens of, and visitors to the Grand Valley Fire Protection District

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