

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Wednesday, November 04, 2015 5:35 PM
To: dave.kubeczko@state.co.us
Subject: FW: Catamount CDPHE Consultation
Attachments: Catamount Energy Archuleta County 09232015.pdf

Scan No 2107671 CDPHE CONSULTATION 2A#400867120

COGCC passed CDPHE's task on 09-30-15 per Kent Kuster

From: Kuster - CDPHE, Kent [mailto:kent.kuster@state.co.us]
Sent: Wednesday, September 23, 2015 7:03 AM
To: John Noto - DNR; Kubeczko, Dave; Greg.Deranleau@state.co.us; John Shepard; nredmond@catamountrep.com
Subject: Catamount CDPHE Consultation

CDPHE has completed the consultation with Archuleta County and Catamount Energy Partners for the Lemke 35-5-29 wellsite. Please see the attached consultation letter. Hard copy of this letter is being sent to COGCC Director Lepore.
Kent

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Kent Kuster

Environmental Protection Specialist III

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September 23, 2015

Mr. Matthew Lepore, Director COGCC
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

Re: Colorado Department of Public Health and Environment (Department) Consultation
Recommendations for the Catamount Energy Partners LLC, Lemke 35-5-29 well pad in
Archuleta County

Dear Mr. Lepore:

This letter describes the Department's recommendations to the Colorado Oil and Gas Conservation Commission (COGCC) on a list of recommended practices to minimize potential impacts to water resources from the Catamount Energy Partners LLC, Lemke 35-5-29 well site located in the SESE of Section 29, Township 33N Range 5W in Archuleta County. These recommendations are based on an onsite visit conducted on September 2, 2015 with the property owner, Archuleta County representative, representatives from Catamount Energy and the Western Location Specialist from the COGCC.

Department staff was initially contacted by the Archuleta County LGD about the potential impacts from this well site on water resources due to shallow ground water and the adjacent Piedra River. The recommendations below were discussed and agreed on during the site location visit and provided in writing by Nolan Redmond representing Catamount Energy.

Drilling/Completion Operations

Drilling mud or brine will be contained in above ground steel tanks. Drill cuttings and solids that have been separated from the drilling fluid by the shale shakers, mud cleaner or centrifuge will be captured in above ground portable steel cuttings bins and hauled to a 3rd party disposal site that is permitted as required by applicable State and Federal rules and regulations. Excess drilling fluid will be stored in above ground portable steel tanks and will be transferred to the active circulating system as needed. At the completion of drilling activity remaining drilling fluid will be used on another well or disposed of as allowed by Local, State and Federal law. The well pad will have a secondary containment berm to prevent spills, releases, and pollution. The berm will be capable of containing 110% of the fluids stored on location. Groundwater will be protected by two strings of steel casing, both of which will be cemented to surface.

Produced Water Containment

Produced water will be temporarily stored in above ground steel tanks until transported to commercial disposal facilities. The on-site storage tanks will consist of two 400 barrel tanks situated inside industrial grade polyethylene walls, 3 feet in height. The inside of the containment walls and all footage contained within the walls will be lined with a 40 mil

polyethylene liner. At a minimum, the outside the tank containment capability of the polyethylene walls will exceed 500 barrels (125% of the largest tank). All tanks will comply with Colorado Oil & Gas Commission rules and regulations regarding manufacture and labeling.

Tank Level Monitoring

The amount of water in the tanks will be monitored continuously by Catamount's SCADA system which includes continuous, real-time tank level data recording and feed. Radar in each tank will provide real-time liquid levels for each tank. Should either tank's water level approach a programmed maximum height a "High Level" alarm/notification will be sent to appropriate Catamount personnel who will then have the ability to remotely shut-down all operations. If levels continue to rise prior to a manual, remote shut down, the system will automatically activate a high level float switch shutting in the well and shutting off production.

Conclusion

Catamount Energy was an active participant in developing the agreed on additional practices for the Lemke 35-5-29 well site. These recommended practices should minimize the potential for impacts to the shallow ground water and adjacent surface water resources addressing the concerns raised by Archuleta County.

Sincerely,

Kent Kuster
Oil and Gas Liaison
Colorado Department of Public Health and Environment

