Laramie Energy/Piceance Energy Harrison Creek Water Treatment Facility (HCWTF)

Impoundment Fluid Transfer Protocols and Contingency Plan

1) All fluid transfers from the Dissolved Air Floatation (DAF) Facility to the impoundments will be overseen by the onsite manager.
2) Fluid transfer volumes into the DAF facility will monitored and recorded at all times.
3) Fluid transfer volumes from the DAF facility to the impoundments will monitored and recorded at all times.
4) Records of fluid transfers will be stored onsite at the HCWTF.

Fluid Transfer Protocols

- Coordinate with onsite manager regarding anticipated timing and approximate volumes of fluid transfer.
- Confirm leak detection system is operating properly.
- After fluid transfer is complete, record or gather fluid transfer volume data.

Fluid Transfer Contingency Plan

- In the event of a leak detection alarm, contact the DAF onsite manager immediately.
- Record date and time of event.
- Coordinate with the DAF onsite manager to terminate fluid transfer.
- Confirm fluid transfer to the impoundment has been terminated at the impoundment inflow location.
- Coordinate with the DAF onsite manager to draw down impoundment until fluid is no longer accumulating in the leak detection sump.
- Pump fluids from leak detection sump and record fluid volumes.
- Collect 3 (three) water samples of fluid from the sump for analysis.
- Report event to the appropriate regulatory authorities (COGCC, etc.) and local government representative(s).
- Investigate the source of fluid accumulation in the sump/leak detection system. Coordinate repairs as appropriate and test to determine if fluid accumulation has been stopped.
- Reset leak detection system and monitor for 72 hours to confirm fluid is no longer accumulating in the sump.
- Secure all available data related to fluid transfer volumes at the time of the alarm.