



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region8

AUG 19 2016

Ref: 8P-W-UIC

F. Lee Robinson, Manager
Windy Hill Gas Storage LLC
P.O. Box 18283
Denver, Colorado 80218

Re: Underground Injection Control (UIC) Program Permit Expiration
Windy Hill Gas Storage LLC Class V Area Permit CO51001-00000

Dear Mr. Robinson:

The U.S. Environmental Protection Agency Region 8 Water Program office has reviewed your request to approve expiration of the Class V Area Permit CO51001-00000. We understand that you no longer need a Class V permit and intend to convert your wells to Class II wells. Our records confirm the Area Permit CO51001-00000 has two associated wells that have been constructed: the UWHGS #1-17, API # 05-087-08137, and the Windy Hill 3-17D, API # 05-087-08145.

The EPA acknowledges that the two wells are currently regulated by the Colorado Oil and Gas Conservation Commission (COGCC). The Windy Hill 3-17D well is now covered by a COGCC UIC Class II permit, as documented by Form 33, COGCC Document ID 400927378, approved by the COGCC on July 7, 2016, with conditions of approval. The EPA also understands that the Windy Hill 3-17D well is covered by a blanket bond, COGCC surety ID 2015-0093, as well as the Class II permit. The UWHGS #1-17 is regulated by the COGCC as an offset well and is covered by the same blanket bond, COGCC surety ID 2015-0093. Your intent is to obtain a Class II permit for the UWHGS #1-17 from COGCC at some time in the future.

Based on our understanding that you are converting the UWHGS #1-17 and the Windy Hill 3-17D wells to Class II wells and that they are now regulated by the COGCC, we have determined that your Class V Area Permit CO51001-00000 has expired due to end of operating life of the Class V wells and is no longer covered under our Class V program. Any injection activity occurring at either of these wells must be covered by a UIC permit from either the COGCC or the EPA. Because the UWHGS #1-17 well is no longer covered by a permit under our Class V program and is not yet covered by a Class II permit from COGCC, you may not inject into it until you receive a permit from the appropriate regulatory authority. To obtain permit coverage under the EPA UIC program, you will need to re-apply and go through the permitting process.

For release of the financial assurance for the UWHGS #1-17 and the Windy Hill 3-17D wells, please contact Benjamin D'Innocenzo of the EPA Technical Enforcement Program at (303) 312-6342.

If you have questions or concerns, please contact Valois Shea of my staff at (303) 312-6276.

Sincerely,



Darcy O'Connor
Acting Assistant Regional Administrator
Office of Partnerships and Regulatory Assistance

