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SENT VIA HAND DELIVERY AND EMAIL

June 18, 2018

Colorado Oil and Gas Conservation Commission  
ATTN: Bob Koehler, UIC Lead Engineer  
1120 Lincoln Street, Suite 801  
Denver, CO 80203  
[bob.koehler@state.co.us](mailto:bob.koehler@state.co.us)

Re: NGL Water Solutions, LLC, Injection Well Permit Application, South Weld  
SWD #1 well, Document Nos. 401602089 and 401600785

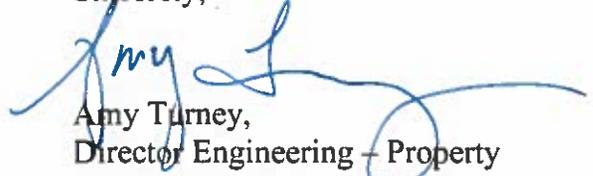
Dear Mr. Koehler,

The City and County of Denver, acting by and through its Board of Water Commissioners (“Denver Water”), is sending this letter to object to NGL Water Solutions, LLC’s (“NGL”) Injection Well Permit Application for the South Weld #1 well located in the NE4 of Section 30-T1N-R66W of the 6<sup>th</sup> P.M. The bottom hole location of the proposed injection well is in the SE4 of Section 19- T1N-R66W of the 6<sup>th</sup> P.M. and is less than a quarter mile from the South Cell of Denver Water’s Lupton Lakes Reservoir located in the northeast and southeast quarters of Section 19- T1N-R66W of the 6<sup>th</sup> P.M. The Lupton Lakes groundwater cutoff wall, a critical piece of reservoir infrastructure, is currently being constructed around the perimeter of the South Cell and is keyed into bedrock. Additional reservoir infrastructure and facilities, such as a pump station, will likely be located in the Lupton Lakes South Cell.

Denver Water requests this application be dismissed. To Denver Water’s knowledge, NGL has not provided a thorough seismic analysis of the formations in which it plans to inject fluids. Neither has it identified possible faults, nor quantified the possible risks (e.g., increased seismic activity) of injecting fluids in this location. Denver Water is aware the Commission has placed restrictions on NGL’s injection wells in other locations due to induced seismic activity. Likewise, the Commission should give careful and due consideration to injection pressures, daily fluid volumes, geologic and hydrogeological characteristics of each injection formation, and risks to facilities and infrastructure located in the area (including those that are keyed into the bedrock) prior to approving any injection permit.

Denver Water appreciates the Commission's careful and thorough consideration of NGL's application. Please don't hesitate to contact me if you have any questions regarding Denver Water's concerns.

Sincerely,



Amy Turney,  
Director Engineering + Property  
[amy.turney@denverwater.org](mailto:amy.turney@denverwater.org)  
303-628-6000

cc: James Wittler, Esq., Office of General Counsel, Denver Water  
Christopher Kamper, Carver Schwarz McNab Kamper & Forbes, LLC  
Paul Gottlob, NGL, by email to [paul.gottlob@iptenergyservices.com](mailto:paul.gottlob@iptenergyservices.com)