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Rule 908.b(8)
Operating Plan

Wexpro Company[®]

Powder Wash Evaporation Facility

**WEXPRO COMPANY
POWDER WASH EVAPORATION FACILITY
OPERATING PLAN**

A. Description

The Powder Wash Evaporation Facility (Facility) will receive and evaporate produced water recovered from gas wells owned and operated by Wexpro Company in the Powder Wash Unit, Ace Unit, and Jacks Draw Unit located in Moffat County, Colorado. The wells that will be contributing water to this facility are currently producing from the Wasatch, Fort Union, and Lance formations. Produced water will be transported via truck to the Facility.

Prior to transport of the produced water, gas will be separated through a dehy/separator located on each individual well facility and stored in a produced water tank. A tank truck will load from the designated produced water tank and haul the produced water to the Powder Wash Evaporation Facility.

Wexpro Company will be taking all precautions to avoid any Hydro-Carbons entering the evaporation pond. Initial Separation of Gas, Condensate and Produced Water occurs at the well location through a separation process. **Initial** Separation of Gas, Condensate and Produced Water occurs at the well location by interrupting the gas flow with pressure cuts, heat and forcing retention time in a three phase separator where the liquids and vapors are allowed to naturally separate from each other. Once the liquids have naturally separated and somewhat stabilize inside the vessel, mechanically controlled valves open at specifically set parameters allowing water to be dumped through piping to the water tank and condensate dumped through piping to the condensate tank. Once the liquids have entered the specified tanks, a **second** point of much more efficient natural separation takes place which is manually interfered with to move water and condensate to their appropriate tankage via pump truck transferring. The produced water would then be hauled, by trucks within the Powder Wash, Jacks Draw, and Ace field to the evaporation facility where the water truck driver connects hoses equipped with camlock fittings to a pump skid, engages the skids electrically driven offload pump which pumps the contents of the truck through a series of filters, to a skimmer tank which would serve as a **third** point of separation to extract any potential hydrocarbons. From the tanks, the produced water is transferred to a lined and netted skim pit, which would be approximately 100' x 58', this skim pit would serve as a **fourth** point of separation to separate any potential hydrocarbons. Any remaining hydrocarbons will be skimmed off the skim pit and put back into the skim tank. The produced water would then be transferred to the evaporation pond, which would be approximately 300' x 300'. The produced water is then pumped from the pond to Barracuda Wastewater evaporators where the water is forced through a stainless steel manifold with 30 spray nozzles specifically designed to allow longer float times maximizing evaporation. The evaporators will be electronically controlled to operate only during specific weather conditions related to humidity, wind speed and temperature with intent of minimizing or eliminating overspray.

The current flow rate into the facility is anticipated to be approximately 5,200 barrels per month (BPM) at mass intake. If Wexpro Company begins active drilling in the area, the throughput will increase initially and then decline over the life of the wells. The maximum working capacity of the facility is approximately 150,000 barrels (bbls). Water levels in the pond will be monitored with a fluid level monitor to track fluctuation and to assure a minimum of two feet of freeboard in the ponds at all times.

B. Dust and Moisture Control

The primary dust control measure used at the facility will be to apply water to the access road and facility site as needed to control dust during operation. However, dust control is typically not needed in this area. Water will be taken from one of the following water sources:

1. Power Wash Deep Well #1 – SE NW 29-12N-97W
 - CDPHE Permit #67436F
2. Powder Wash Camp Water Source Wells – NE NE 5-11N-97W
 - a. Musser 2 Water Well – CDPHE Permit #35879F
 - b. Musser 3 Water Well – CDPHE Permit #35880F

Wexpro Company has incorporated this facility into its existing spill prevention, control, and countermeasure plan (SPCC) to prevent the discharge of petroleum products from the storage tanks. The current authorization number is COR03I332. The off load produced water storage tanks will be surrounded by a steel secondary containment of sufficient capacity to contain 110% of the largest storage tank. Wexpro Company will comply with all appropriate Colorado Division of Oil and Public Safety standards associated with storage tanks and tank batteries. Refer to Wexpro Company's Emergency Response Plan for specific emergency response procedures. (Attachment ERP in the Contingency Plan)

Wexpro Company intends to use engineered controls from allowing any misting from blowing outside of the lined pit itself, as any misting outside of the lined pit (including the 30' fire lane) will be considered a Spill/Release. Wexpro Company will install a doppler radar system that will detect wind speed, direction, and humidity. Control limits are set to avoid overspray. When levels reach a certain criteria the evaporators will automatically shut off.

C. Sampling

Wexpro Company proposes to continue to use the existing water well known as Musser 2 Water Well, at Powder Wash Camp, located west of the facility, to monitor water quality. Water samples will be collected from the permitted Musser Water Well #2, as it is the only water well being used for domestic purposes within a 2 mile radius. Groundwater samples that have recently been collected and analyzed will be used to establish baseline quality conditions. Musser 2 water well analysis results from 2013 through 2018 are included as attachment A-14 in Figures. Analytical parameters will be selected based on the proposed waste streams handled in the evaporation facility and will include all major cations and anions, total dissolved solids, iron, nitrates, nitrites, and, pH, and specific conductance. Testing will be conducted twice a year and results will be provided to the COGCC within 3 months of collecting samples. Results of the monitoring program will be included in Wexpro's annual 900 Series facility report to the Director of the COGCC.

D. Inspection and Maintenance

A daily visual inspection will be conducted of the evaporation pond, a daily check will also be completed of the Bird Avert System. The daily check of the Bird Avert System will consist of the following:

- Checking the computer system for any alarms or malfunctions,
- The complete Bird Avert System will be manually activated to insure the system is operating.

These daily visual and Bird Avert System checks of the facility will be recorded in a log book kept on location, where upon request, will be available to any authorized governing agency.

The facility's fluid levels and leak detection will be monitored in person on a daily basis. Incremental markers will be located on the liner and will be visible. The water level will be monitored to ensure a minimum of two feet of freeboard in the ponds at all times. A leak detection system will be installed as follows:

The skim pit and evaporation pond will be lined with a 4 part HDPE liner system, which will also include a leak detection system. (Sheet 4 of the engineered drawings).

1. Primary Liner, 60 mil min. HDPE.
2. 200 Mil GSE Hypernet Geonet or Approved Equal.
3. Secondary Liner, 60 mil min. HDPE.
4. Geotextile Fabric or Bedding Material Under Bottom Liner.

The skim pit will be netted with 1" or less size holes. The leak detection system will consist of the following:

- 4 Part HDPE Liner System, with leak detection for both Skim Pit and Evaporation Pond.
- Primary liner is 60 mil min. HDPE.
- 200 Mil GSE Hypernet Geonet or Approved Equal.
- Secondary liner, 60 mil min. HDPE.
- Geotextile Fabric or Bedding Material under bottom liner.

The Pond will be constructed with a pyramid shaped bottom and extended excavation at each corner where monitoring wells will be installed and checked by operations personnel on a daily basis for early detection of liner breach.

Initially all monitor wells (one at the skim pond and two at the evaporation pond) will be gauged daily until water has covered the entire pond; then they will be gauged weekly.

The observation sump will consist of PVC pipe stand with a solid bottom and a rodent proof lid. The observation sump will also have an invert 2 feet lower than the pipe invert elevation. The leak detection system and observation sump are detailed on Sheet 4 of the engineered drawings.

When water is pumped to the facility, the water supervisor will be informed of the intention to pump and will be given the anticipated time, expected duration and quantity. Once authorization to pump has been given by the water supervisor, personnel experienced in produced water management will walk the entire surface system and inspect all fittings and valves to ensure they are all in good working condition and in proper alignment for water receipt at the facility. Verification will be communicated to all parties involved that pumping operations can commence. The water truck driver connects hoses equipped with camlock fittings to a pump skid, engages the skids electrically driven offload pump which pumps the contents of the truck through a series of filters. The pump system will be put on line and onsite flow volumes will be confirmed. All valves will be placed in proper alignment before and after the job. After pumping operations commence, verification that water flow has been established will be reported back to the pumping crew. All volumes will be cross checked after completion of the job to ensure anticipated water volumes were pumped. Metering records of all jobs including date, location, time and quantity will be kept and reported to proper personnel.

During normal operations, daily inspections will be performed by a Wexpro Company field operator or designated representative. During the daily inspection, the operator will perform the activities detailed in the “Powder Wash Evaporation Log”, (Appendix A). Adherence to the criteria on the checklist will involve visual inspections of the facility, equipment and tanks, an assessment of the pond level while also looking for any sheen, visual inspection of stormwater BMP’s, skim pit netting, wildlife fencing, and performance of general housekeeping activities. The field operator will ensure that all equipment is working properly and document the inspection. If any irregularities are noted during the inspection, a supervisor will be notified and if required an appropriate response plan will be coordinated to resolve any issues.

Pond water will be sampled weekly and results will be provided upon request. Leak detection testing on piping, sampling from test wells, sampling of monitoring springs and additional equipment inspections will occur. These items are detailed on the “Powder Wash Evaporation Log” (Appendix A). Based on inspection results, Wexpro Company will determine if the facility will need to be drained and given a full inspection. The schedule of inspections may be modified by the COGCC as part of the State’s approval process, but otherwise will take place on a daily and weekly basis. All checklists will be revised, as necessary, to keep with current regulatory requirements.

E. Emergency Response

To ensure a safe and timely response to emergency situation, Wexpro Company provides all field personnel with contact information for the Moffat County Sheriff’s Department, the Craig, Colorado fire department, and emergency medical service providers. Wexpro Company will provide local emergency response agencies with a detailed map showing the location of the facility, providing detailed directions and GPS coordinates to facilitate a timely response. Wexpro Company’s Emergency Response Plan has been include as an attachment. A helicopter landing site has been established and is located at N 40°57.086’, W -108°18.634’. In the case of injuries or medical problems that are not life threatening, the injured person would either be transported from the facility in a company or contractor vehicle to the nearest medical center for treatment, or transported by ambulance; depending on circumstances.

Smoking on-site and open fires will not be permitted at the facility. All vegetation will be cleared from the site during construction, reducing the risk of wildfires.

F. Record Keeping

As stated above, typical operation of the facility will include transferring water to the facility from existing well pads by truck. It will be the responsibility of the field operator to manage daily inputs to the facility. All evaporation pond facility operations will fall under the control of Wexpro’s production and field operations group.

All records of the site inspections will be filled in manually, signed by the responsible operator, and scanned into an electronic record keeping system for access by all management personnel. Wexpro Company will manually record the facility operation parameters as well as generate electronic tracking to maintain a safe operational facility.

G. Site Security

The site is located in a rural and remote area of Moffat County north of Craig, Colorado.

The facility is fenced to prevent access to the pond area by wildlife or domestic animals. A manually locking gate will be located at the entrance of the facility and will remain open during daily operations. One cattle guard will be in place to keep area wildlife and domestic animals from entering the open gate. All wildlife that may inadvertently become trapped by the fencing will be immediately reported to the Colorado Division of Parks and Wildlife.

H. Hours of Operation

The facility will operate 24 hours a day during spring, fall, and summer months for evaporation. The evaporation devices will be inactive during winter months, however, the facility will continue to operate. Contractors will be onsite during offloading of produced water between the hours of 7:00 A.M. and 5:00 P.M. and for field personnel to complete daily visual inspections.

I. Noise and Odor Mitigation

Wexpro Company does not anticipate any noise or odor issues with the facility. Noise impacts will be controlled through the implementation of industry best management practices and requirements under any regulatory permits. The facility will adhere to Moffat County, COGCC, CRS, and BLM criteria for Industrial/Agricultural/Rural zones. Impacts associated with odor will be mitigated by adherence to the Colorado Department of Public Health and Environment (CDPHE) Air Quality permitting.

J. Final Disposition of Waste

If the accumulation of fluid in the evaporation pond exceeds the working capacity, it will be transported to a licensed disposal facility or permitted injection well. All existing wells are currently authorized for disposal at Wexpro's F Wilson 21 Disposal Facility, Hiawatha, CO. Accumulated sediment wastes and solids from the "sludge tank" will be transported to a licensed disposal facility once a year. Any testing of the material will be completed at the direction of the disposal facility.

K. Leak Detection Actions and Annual Reporting

If inspection of the leak detection system determines fluids are accumulating in the "containment area" as a result of a leak, the pond will be emptied to a point where the leak detection system is no longer detecting fluids. All liquids will be disposed of according to the appropriate local, state, and federal regulations and approvals. If a leak is identified, it will be reported to the BLM and COGCC immediately for review and input. Any evidence of contamination to groundwater will be reported immediately. All leaks will be managed in accordance to COGCC Rule 906, Environmental Protection Agency's SPCC regulations and BLM Onshore Order 7 and NTL-3A, Reporting of Undesirable Events.

Wexpro Company will submit an annual 900 Series facility report summarizing operations, including the volume of produced water disposed of at the facility and the test results of all spring and monitoring well samples.

Wexpro Company will submit all test results from monitoring wells and springs within three months of collecting the samples. Results of the monitoring program will also be included in Wexpro's annual 900 Series report to the Director.

L. Facility Closure

When the facility is deemed to be at the end of its useful life, it will be closed according to local, state, and federal regulatory requirements for disposal of wastes in place at the time. All accumulated wastes will be disposed of according to applicable regulatory requirements.

Methods for disposal of the accumulated wastes could include transport to a licensed facility, land farming or burial; depending on the chemical constituents of the materials, analyzed through sampling.

Wexpro Company will submit a Form 4 Sundry Notice to the COGCC for approval prior to commencing closure of the facility. All documentation will be simultaneously reported to the BLM. Wexpro Company will collect unevaporated pit water samples and analyze them for compliance with Table 910-1 concentration levels.

APPENDIX A

Inspection Checklist