

From: Ellen Sassano [<mailto:ellen.sassano@pitkincounty.com>]

Sent: Friday, June 14, 2019 3:01 PM

To: Arnold, Mark <Mark.Arnold@blackhillscorp.com>; Kurt Dahl <kurt.dahl@pitkincounty.com>; Laura Makar <laura.makar@pitkincounty.com>; Cindy Houben <cindy.houben@pitkincounty.com>

Subject: Re: Wolf Creek

**** EXTERNAL EMAIL. Is this an expected email? STOP and THINK before clicking links or opening attachments. ****

Mark,

As we received no formal public objections or direction from BOCC for further consideration of the FONSI decision during the required 21 day period set forth in the Pitkin County Land Use Code, the FONSI decision regarding the replacement of Black Hills Natural Gas Storage Wells #9D-2 and #9D-3 in the Wolf Creek Storage Unit is effective as of today, June 14, 2019. I will be in touch on Monday to follow up on next steps.

Have a great weekend!

Ellen

On Fri, Jun 14, 2019 at 8:10 AM Arnold, Mark <Mark.Arnold@blackhillscorp.com> wrote:
Good morning Ellen,

Just wanted to check in on the status of the permit, did any of the Commissioner's object?

Thanks,

Mark Arnold

Sr. Manager Gas Operations – RMNG | Black Hills Energy
mark.arnold@blackhillscorp.com | Cell (720) 899-6965

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**ADMINISTRATIVE DECISION OF THE COMMUNITY DEVELOPMENT DIRECTOR
OF PITKIN COUNTY, COLORADO, DETERMINING THAT A FINDING OF NO
SIGNIFICANT IMPACT (FONSI) PURSUANT TO ACTIVITIES OF STATE
INTEREST, IS WARRANTED FOR THE REPLACEMENT OF EXISTING ROCKY
MOUNTAIN NATURAL GAS STORAGE WELL NUMBERS 5 AND 9 IN THE WOLF
CREEK STORAGE UNIT**

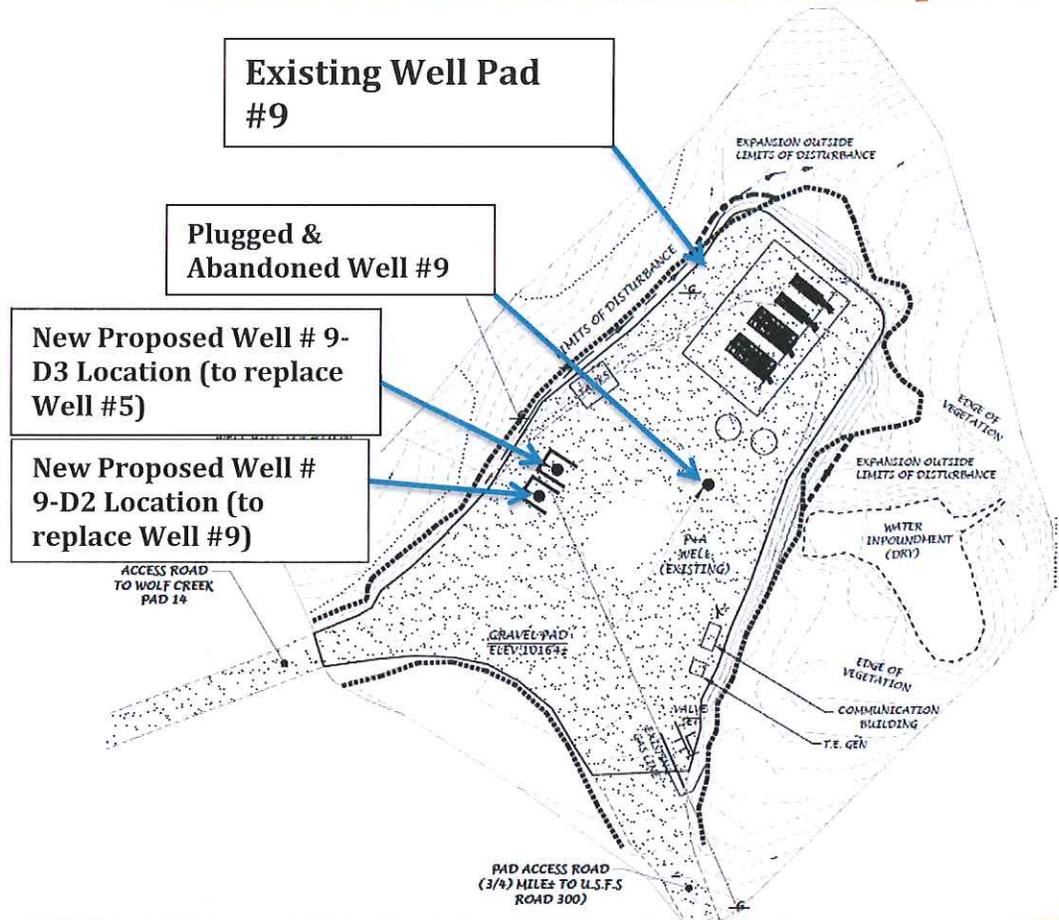
Administrative Decision No. 029 - 2019

RECITALS

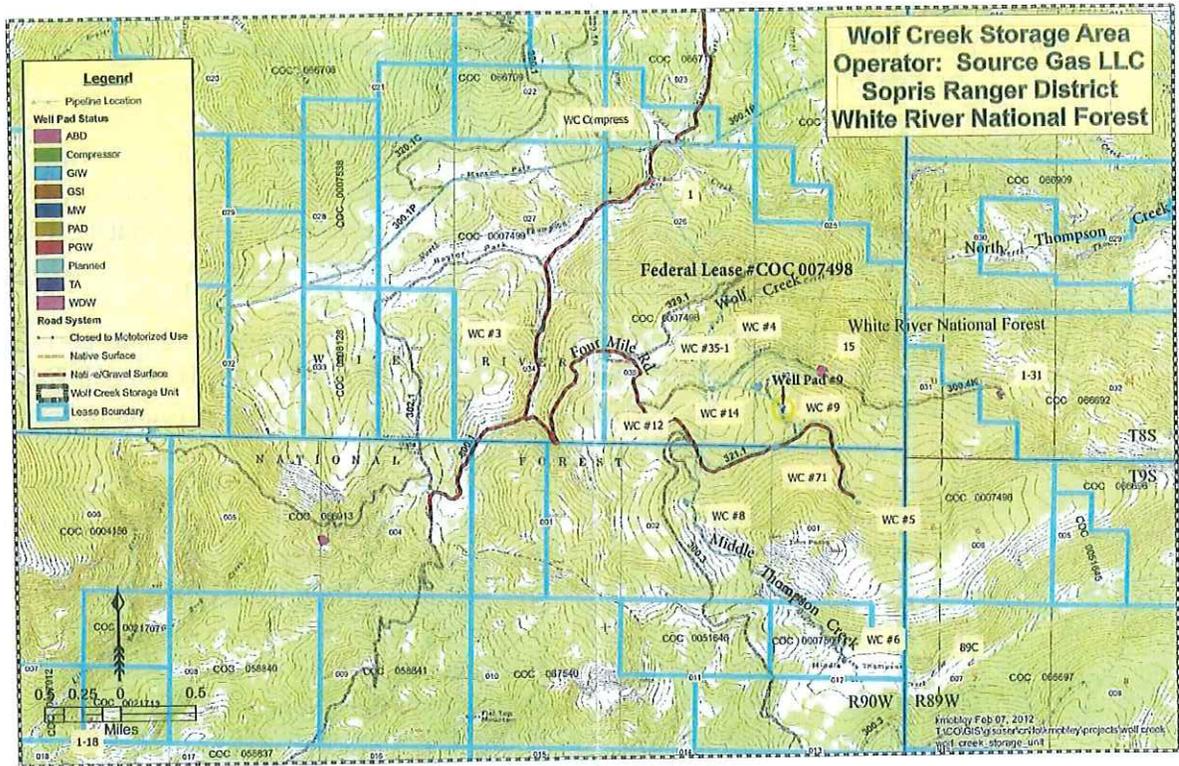
1. Rocky Mountain Natural Gas, LLC./Black Hills Energy (hereafter referred to as “Applicant” and/or “RMNG”) has applied to the Community Development Director of Pitkin County (“Director”) for a determination that a Finding of No Significant Impact (FONSI) pursuant to Activities of State Interest, is warranted to drill two new natural gas storage (injection) wells in the Wolf Creek Storage Unit to replace both the existing Wolf Creek Unit #5 well and the Wolf Creek Unit #9 well on existing well pad #9. The two new storage wells (#9-D2 and #9-D3,) were deemed to be necessary when inspections of both existing wells, #5 and #9 identified corroded casing and outdated emergency equipment, which were considered to pose public safety and environmental concerns. As the new replacement wells will be drilled and completed on one existing well pad (#9,) and existing wells have been or will be plugged and abandoned, no additional disturbance off the existing well pad is anticipated, with the exception of the addition of a small amount of fill added to the perimeter of well pad #9 to accommodate modern drilling rig apparatus. Existing well pad # 5 will be taken out of operation upon plugging and abandoning of well #5, after completion of new wells. The new storage wells are proposed to be drilled to a depth of approximately 5,200 feet.



Construction and Site Layout



2. The well pad is located in the Wolf Creek Storage Unit on Federal Lease # COC0007498 on U.S. White River National Forest Service land, off of Garfield County Road 117 (Four Mile Road) and Forest Service Road 321. It is located at the NESW Section 36/T8S/R90W/6PM in Pitkin County. The well pad is approximately .76 acres in size. No new roads will be necessary to access the existing pad. The federal mineral lease on which the well is located is zoned RS-30, and contains 2,200 acres.
3. Well #5, which was originally drilled in 1965, will be plugged and abandoned upon completion of replacement well #9-D3. Well #9, which was originally drilled in 1967, was recently plugged and abandoned and will be replaced by Well #9-D2.
4. Replacement wells will be used as injection/storage wells, allowing Rocky Mountain Natural Gas (RMNG) to respond to ebbs and flows in demand for natural gas in the Roaring Fork Valley. Natural gas is injected into the field (wells) during the summer when there is typically less demand, and extracted during high-demand winter months.

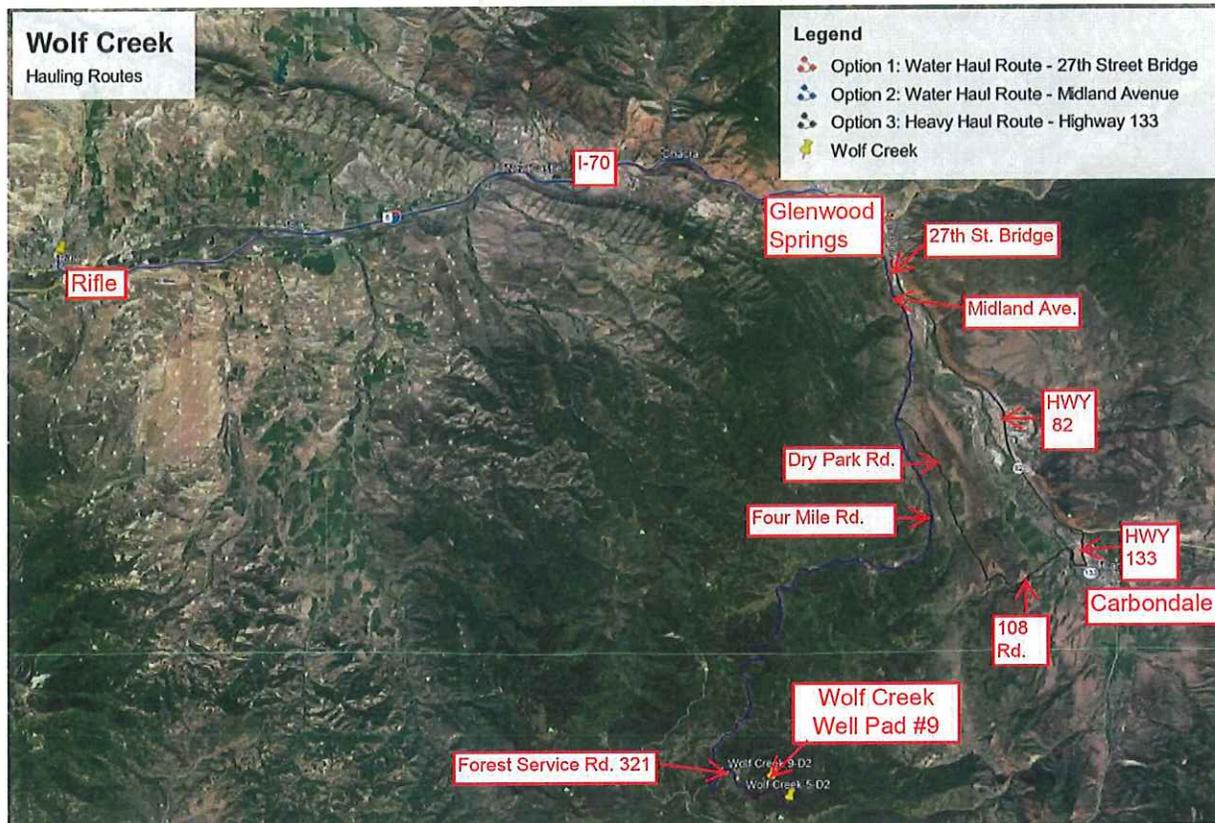


- Pipelines and transmission lines used for distribution to and from these well pads are existing, and do not need to be modified for this project. The existing Crystal River Compression Station maintains pressure in the transmission lines that serve these wells.
- Construction associated with drilling and completion of both new wells, and plugging and abandoning of Well #5, is anticipated to start in mid-June, 2019 with a completion date set for December, 2019. The replacement wells are estimated to have a beneficial life of 30 years.
- The Wolf Creek Gas Storage Unit in which the subject lease and proposed replacement wells are located, spans Township 8 South and 9 South in Ranges 90 West and 89 West in the 6th P.M. The unit consists of approximately 9,524 acres located entirely within the White River National Forest. There are ten active wells in the unit, including 7 injection/withdrawal wells and 3 monitoring wells. Six of the wells were drilled in the 1960s; one was drilled in 1974; two were drilled in the 1980s; and the most recent well was drilled in 1992.
- The Wolf creek natural gas field was first established in 1961. It produced steadily until 1973 when natural gas was depleted, and it was converted to a natural gas storage field. It has operated as a storage field continuously for the past 45 years.
- During the six-month duration anticipated for completion of the well replacement project, approximately 25 employees not already based in the area will be housed in a temporary “man-camp” to be developed on a Rocky Mountain Natural Gas-owned property known as the “Saw-Mill” site. The Saw Mill Site is located in Garfield County near the snow

mobile parking lot of off USFS 300 road, approximately 4 miles up USFS 300 Road from Four Mile Road. The intent of use of a man-camp is to help limit project vehicle traffic up and down Four Mile Road and to promote safety by reducing travel distance for the employees of contractors who would otherwise be housed in Glenwood Springs lodging, after working. Temporary camps are subject to Garfield County review and permitting for minor temporary employee housing. Review and permitting by Garfield County for a man-camp or any other temporary housing requiring permitting within Garfield County, will be required prior to commencement of well replacement activities.

10. Haul Routes for drilling and completion operations will be coordinated and permitted as necessary with Garfield County, the City of Glenwood Springs and Town of Carbondale to accommodate access to the well pads. No Pitkin County-owned roads or easements will be used to access the sites for replacement of the wells.
 - a. Drilling rigs are anticipated to be transported up to the Wolf Creek Unit once at the beginning of the project and down once after drilling is complete, in a convoy of 25 vehicles via I-70 to Hwy 82 to Hwy 133 to West Main St. (Carbondale,) to Garfield County Rd. 108 to Dry Park Rd. to Garfield County Rd 117 (Four Mile Rd.,) to Forest Service Road 321 to the well pads. The convoy is anticipated to go through Carbondale at 4:00 a.m. or 5:00 a.m. to avoid conflicts with other traffic. The applicant will contact the Carbondale Police Department in advance of the convoy. The drilling rig will drill both wells consecutively before being removed from the site.
 - b. Water Hauling and Completion Trucks will take I-70 to Glenwood Springs to exit 116, across the new Highway 82 bridge to 27th Street bridge and across the bridge to Midland Avenue, south on 4-Mile Road. As the 27th Street bridge will be under construction during 2019, the applicant will coordinate alternate routes with the City of Glenwood and Town of Carbondale.
 - c. Up to 15 truck trips per day are anticipated during drilling operations (tentatively July 8-September 8,) and up to 18 truck trips are anticipated per day during well completion (tentatively Sept. 9-19). Truck trips will be necessary to accommodate a variety of loads and activities including but not limited to, drill rig mobilization and demobilization, pipe loads, cement pump trucks, water trucks, transport of well buildings and equipment, and crew vans. Upon completion of well replacement, traffic associated with the storage wells will revert to the current operations maintenance level of 1 truck per day.

Haul Routes



11. The two proposed wells are within the boundaries of the White River National Forest, in Pitkin County, Colorado. Federal and State permits are required and must be obtained from the following agencies prior to commencement of activities:
 - a. Bureau of Land Management and United States Forest Service respectively: application for a permit to drill;
 - b. Colorado Oil and Gas Conservation Commission: application for a permit to drill
 Copies of approved permits will be submitted to Pitkin County once approval is obtained, prior to commencement of operations.

12. RMNG maintains an agreement for the subsurface storage of gas and current gas storage leases with the Bureau of Land Management below the property. Federal leases held by RMNG, grant access and usage of the United States Forest Service surface above the leases.

13. As the federal leases are located within Pitkin County, they are also subject to County review and approval for Land Use code provisions relating to *Location and Extent Review* and *Activities of State Interest*. The proposed replacement wells are considered to be “*Construction of Major Facilities of a Public Utility*,” and therefore an “*Activity of State Interest*” pursuant to Section 12.30 of the Land Use Code. The Community Development Director may determine that a FONSI should be issued if construction or operation of the Project, without mitigation, in its proposed location is unlikely to have

any significant adverse impact to the County in Consideration of the Permit Application Approval Criteria in Section 12.40 of these Regulations.

14. The application was referred to the Pitkin County Attorney, the Town of Carbondale, City of Glenwood Springs, Garfield County, City of Rifle, Crystal River Caucus, Colorado Parks and Wildlife, Pitkin County Engineer, Pitkin County Emergency Manager, Pitkin County Assessor and the Pitkin County Environmental Health Director. Comments received have been incorporated in the Staff Review and conditions attached to this Administrative Decision.
15. **The Director has determined that a FONSI is warranted for the drilling and completion of natural gas storage well numbers 9D-2 and 9D-3 to replace well numbers 5 and 9 on existing well pad #9 in the Wolf Creek Storage Unit based on the finding that the location and use are unlikely to have any adverse impact to Pitkin County based on the following criteria:** (Short-term impacts associated with roads/haul routes and temporary housing located in jurisdictions other than Pitkin County, will be subject to applicable review and approval by the jurisdictions in which the activity will occur, prior to commencement of well replacement work.)
 - a. The new wells are replacing existing storage wells on an existing well pad, with a minimal periphery expansion of the pad to accommodate modern drilling rig apparatus, and negligible disturbance outside of the pad;
 - b. New wells are deemed to be necessary based upon inspections that identified corroded casing and outdated emergency equipment, both of which potentially posed public safety and environmental concerns;
 - c. Replacement wells will utilize existing transmission lines;
 - d. No new access roads are required to accommodate the replacement wells;
 - e. No Pitkin County-owned Roads or easements will be used to access the sites;
 - f. Location of the well sites within the Wolf Creek Storage Unit, consisting of approximately 9,524 acres located entirely within the White River National Forest, results in a distance of between 7 and 10 miles and 2,000 feet of elevation between the wells and any occupied residential structures, and negligible visual impact;
 - g. Due to the fact that the Wolf Creek Storage Unit has operated as a storage field continuously for the past 45 years, impacts to recreation on surrounding public lands will remain essentially unchanged with the exception of short term well pad access closure during drilling and completion of replacement wells;
 - h. Based on proposed operating procedures and the fact that the proposed new storage wells are replacing existing storage wells in an existing storage well unit, Colorado Parks and Wildlife indicates that the activity should result in negligible impacts to wildlife;
 - i. The applicant's representations regarding proposed operating procedures include monitoring to protect air and water quality as outlined in Exhibit A to this FONSI;
 - j. Replacement wells will continue to serve existing natural gas demand in the Roaring Fork Valley.

16. The Director further determines that a FONSI is warranted based on consideration of the following criteria applicable to Matters of State Interest, Section 12.40 of the Pitkin County Land Use Code:

- (1) **Property Rights, Permits and Approvals:** Prior to commencement of the use of haul routes and well drilling and completion operations, RMNG must obtain and comply with required permits and approvals from the following agencies and jurisdictions:

Permits to drill:

- a) Bureau of Land Management;
- b) U.S. Forest Service;
- c) Colorado Oil and Gas Conservation Commission;

Haul Route Access Approvals and Permits, as required by respective jurisdictions:

- d) Garfield County;
- e) City of Glenwood Springs; and
- f) Town of Carbondale.

Approval for Pitkin County Activities of State Interest (Administrative FONSI Decision,) & Location and Extent Review (Pitkin County Planning and Zoning Commission Decision) is also required prior to commencement of well replacement activities.

- (2) **Impair Other Property Rights:** Rocky Mountain Natural Gas (RMNG) has obtained and maintains required agreements for the subsurface storage of gas storage leases with the Bureau of Land Management below the surface of the property and with the United States Forest Service for access and use of the surface above the leases. The leases are located entirely on federal public lands and are not adjacent, or in close proximity to private property.
- (3) **Consistent with Land Use and Water Quality Plans:** Pitkin County Planning & Zoning Commission Location & Extent Review & Approval Resolution No. 05-2019 finds the proposed use to be consistent with the Crystal River Caucus Master Plan, which is the applicable local Master Plan, subject to conditions with which the applicant must comply.

- (4) **Expertise and Financial Capacity:**

The project appears to be technically and financially feasible based on the fact that the applicant is a public utility subject to financial standards established and regulated by the Public Utility Commission (PUC); and that these are replacement wells serving existing natural gas demand in a storage field that has been operating for 45 years.

- (5) **The Project is Not Subject to Significant Risk from Natural Hazards:**

The applicant proposes to coordinate emergency plans and operations with the Pitkin County Emergency Manager to address any potential for wildfire within the area. No other natural hazards are identified in the immediate vicinity of this site.
- (6) **Adverse Effect on Land Use Patterns:** No change in land use patterns or long term increased activity will result from well replacement within the existing, surrounding Wolf Creek Storage Unit.
- (7) **Provision of Local Government Services:** Given that the two proposed storage wells are replacing two existing storage wells in the same location on an existing pad, and that haul routes do not utilize Pitkin County Roads, no change or additional impacts to existing Pitkin County road-related services are anticipated. Services that will continue to be utilized to accommodate this use include emergency services in the event of an emergency, and Environmental Health Dept. services to coordinate with the CDPHE and other local jurisdictions to ensure that water and air quality standards are met through monitoring.
- (8) **Financial Burden on Existing or Future Residents:** Replacement of the two storage wells is not anticipated to increase the existing tax burden or fee structure for government services, or create new financial burdens on residents, due to the fact that the proposal is for replacement of existing storage wells rather than for “new” development and infrastructure.
- (9) **Degrading Economic Sector:** Given the fact that the replacement of storage wells will be addressing infrastructure needs for existing natural gas demand in the Roaring Fork Valley, this use is not anticipated to affect the value or productivity of lands, to change the local economy, or provide opportunities for economic diversification.
- (10) **Recreational Experience:** As the existing Wolf Creek Storage Unit and the proposed replacement wells are, and have been located on the White River National Forest since the 1960s, the current storage use has historically co-existed with recreational uses on the Forest. Recreation in the area includes hiking, camping, mountain biking, snowmobiling, back-country skiing, hunting and fishing, among other uses. Some access roads will be closed during the well replacement for safety reasons, but once the wells are operational, there will be no noticeable change from existing conditions and no net-effect on long-term recreational opportunities.
- (11) **Principals of Resource Conservation, Energy Efficiency, Recycling/Reuse:** To the extent that the storage well replacement is simply supporting existing demand for natural gas in the Roaring Fork Valley, it has minimal impact on energy conservation or efficiency.
- (12) **Air Quality:** The applicant’s representations regarding proposed operating procedures include extensive air quality sampling and monitoring to maintain air quality, as identified in Exhibit A to this FONSI.

- (13) **Visual Quality:** Location of the well sites within the Wolf Creek Storage Unit, consisting of approximately 9,524 acres located entirely within the White River National Forest results in a distance of between 7 and 10 miles and 2,000 feet of elevation between the wells and any occupied residential structures, and negligible visual impact from residences. Upon completion of well replacement, there will be no change to visual aspects of the storage field to those who recreate in, or travel through the area.
- (14) **Surface Water Quality:** The project is subject to a Colorado Department of Public Health and Environment Stormwater Permit, and the applicant represents that all of those permit standards will be met. Furthermore, the applicant's representations include extensive sampling and monitoring to maintain surface water quality, as identified in Exhibit A to this FONSI.
- (15) **Ground Water Quality:** The project uses a casing and cement program approved by Colorado Oil and Gas Conservation Commission and Bureau of Land Management engineers, all of which are intended to protect ground water quality. Furthermore, the applicant's representations include extensive sampling and monitoring to maintain ground water quality, as identified in Exhibit A to this FONSI.
- (16) **Wetlands and Riparian Areas:** Due to use of an existing well pad and access roads, and nominal changes to grading, no impacts to wetlands or riparian areas in the vicinity are anticipated.
- (17) **Terrestrial or Aquatic Animal Life or its Habitat:** Colorado Parks and Wildlife Staff identifies the following wildlife and habitat in proximity to the replacement wells:
- a. The existing U.S. Forest Service access road crosses through Elk Production Area, which is active between the dates of May 15 through June 15, annually.
 - b. The area qualifies as Black Bear Habitat.
 - c. While Lynx habitat does exist in the area, the proposed timing for replacement of the wells, and the fact that the applicants are replacing existing infrastructure rather than creating new development/disturbance does not warrant specific conditions relating to Lynx.
 - d. Conservation populations of Colorado River Cutthroat trout exist in the Thompson Creek drainages downstream from the project area.

The replacement wells are not likely to result in any change to impacts to wildlife, as they will be drilled on an existing pad using existing access roads and upon completion, the historic use will be unchanged.

- (18) **Terrestrial Plant Life or Plant Habitat:** While the use will remain unchanged and there will be no new disturbance to plant life and/or habitat after completion of the replacement wells; the applicant will comply with U.S. Forest Service requirements to address road dust and protect adjacent plant life. Furthermore, if deemed necessary by the surface owner (U.S. Forest service,) any revegetation

required will be accomplished using an approved U.S. Forest Service plant and/or seed mix.

- (19) **Soils and Geologic Conditions:** As existing roads and well pad will be used, disturbance and deterioration to soils during drilling and completion should be negligible and essentially unchanged.
- (20) **Nuisance:** While traffic in the region will increase during drilling and completion, traffic will resume its normal pattern when well replacement is complete. Given the distance of the Wolf Creek Storage Unit from occupied residences, nuisances have not historically been an issue, and are not anticipated to occur as the use is not changing.
- (21) **Historic Resources:** As existing access and well pad will be utilized for well replacement, no impact to historic resources is anticipated.
- (22) **Hazardous Materials:** The applicant represents the following regarding hazardous materials associated with storage well replacement and ongoing operations:
 - a) Well replacement and operation will not generate any waste classified as hazardous waste under the Resource Conservation and Recovery Act; and
 - b) Waste management will be addressed by following COGCC's E&P waste management regulations (Series 900,) and by following RMNG's current non-hazardous and universal waste management practices;
 - c) Fluids stored on location will have secondary containment as required by the Environmental Protection Agency's Spill Containment and Countermeasure Rule, as well as by the requirements of COGCC;
 - d) Hauled water, if not used in the drilling and/or completion process, will be disposed of offsite at GreenLeaf Environmental in DeBeque, Colorado.
- (23) **Benefits:** Replacement of two existing natural gas storage wells to ensure the integrity of the infrastructure should result in improved health/safety and environmental protection for the County and its citizens. Furthermore, replacement of the wells should result in the continuation of a reliable supply of natural gas to address existing ebbs and flows in existing demand in the Roaring Fork Valley. As replacement will use existing access roads and well pad, there should be no resulting loss to any natural, agricultural, recreational, grazing, commercial or industrial resources within the County, or losses of opportunity to develop such resources.
- (24) **Natural Features:** No degradation to surrounding natural features should result from storage well replacement, as drilling and completion will use existing access roads and well pad.

17. The Director also finds that a FONSI is warranted pursuant to the following criteria applicable to Site Selection and Construction of Major Facilities of a Public Utility, Section 12.40.120:

- (1) **Siting Results in Proper Utilization of Existing Facilities & Associated Systems Within or Serving the County:** Siting appropriately uses existing infrastructure and facilities, as the well replacement will occur within an existing storage field that has operated continuously in this location for 45 years. Both wells will be drilled on an existing well pad and will utilize existing transmission lines.
- (2) **Growth & Development Associated with Facilities Can be Sustained within Financial & Environmental Capacity of Area; & in Accordance with Applicable County Land Use Plans:** As the storage well replacement is proposed to address existing natural gas demand in the Roaring Fork Valley, the facilities are not anticipated to be growth generators.
- (3) **Existing Facilities Servicing the Area Must be at or Near Operational Capacity:** The two storage replacement wells are necessary to replace aging infrastructure, and will use existing pipelines to transport gas into and out of the storage field. No increase in operational capacity is proposed.
- (4) **If Facility Extension or Replacement is Proposed, Age, Operational Efficiency & State of Repair or Level of Service are Such that Replacement is Warranted:** Two wells will be replaced. One will replace the existing Wolf Creek Unit Govt. 5, which was drilled in 1965. The second will replace the recently plugged and abandoned Wolf Creek Unit #9, originally drilled in 1967. Both wells exhibited compromised integrity, warranting replacement to ensure public safety and environmental protection, and continued ability to provide for existing natural gas demand in the Roaring Fork Valley.
- (5) N/A
- (6) **Major Facilities of a Public Utility Shall Be Located to Avoid Conflict with Adopted local Comprehensive, State & Regional Master Plans:** Assuming compliance with conditions in this FONSI Decision, replacement wells will be consistent with the local applicable Crystal River Master Plan. It is assumed that receipt of required permits from State and Federal Agencies will reflect consistency with applicable State and Federal Resource Management Plans.
- (7) **Where Feasible, Major Facilities of a Public Utility Shall be Located to Minimize Dedication of New Right-of-Way and Construction of Additional Infrastructure (e.g., pipelines, roads and transmission lines.)** Both new wells are sited on an existing pad to utilize existing roads, pipelines and surface disturbance. No new rights-of-way or construction is necessary of requested to accommodate this project.
- (8) **Project Complies with County's Framework for Managing Trans-Basin Water Diversions to Protect Stream Health in Pitkin County:** This project is not anticipated to result in the need for Trans-Basin Water Diversions, as water required for drilling and completion will be obtained from the City of Rifle Municipal water supply. Used water will be transported to an approved facility (Greenleaf Environmental,) pursuant to applicable State and/or Federal regulations.

APPROVED by the Director, subject to the following conditions, which shall be binding on all successors in interest:

1. The Applicant shall adhere to all material representations made in the application, amended application, supplementary submissions including Exhibit A to this decision, and in written and verbal communication, and shall consider those representations to be conditions of approval, unless amended by other conditions.
2. Regarding Emergency Operations Plan: Prior to commencement of drilling and completion operations for well replacement, the applicant shall file emergency operations plans required by the USFS/COGCC and/or BLM with the Pitkin County Emergency Manager in the Pitkin County Sheriff's Office.
3. Prior to use of haul routes for purposes of drilling and/or completing well #s 9 D-2 and #9 D-3 and/or for hauling water to and/or from the site, the applicant shall obtain consent or permits, as applicable, from the U.S. forest Service, Colorado Dept. of Transportation, Garfield County, the Town of Carbondale and the City of Glenwood Springs for use of their respective roads to ensure that construction management, timing constraints, weight limits, safety and environmental considerations, dust maintenance and potential impacts to neighborhoods are addressed to the satisfaction of each respective jurisdiction.
4. The applicant shall purchase and haul water from the City of Rifle, or other municipality downstream of Pitkin County for all operations related to drilling and completion.
5. Hauled water, if not used in the drilling or completion process, shall be disposed off-site at a commercial facility approved subject to applicable State and/or Federal requirements.
6. Prior to commencement of drilling and well operations, the applicant shall provide copies of all approved federal, state and local permits required for operations, to the Pitkin County Community Development Department.
7. The applicant shall comply with all conditions in the Pitkin County Planning & Zoning Commission Location and Extent Resolution # 05-2019.
8. Prior to commencement of operations, the applicant shall provide an equipment list and number of days equipment will be on-site for well completion. The applicant shall specify whether replacement wells will be new wells or work-over of existing wells, and name the drilling rig operator(s) under either circumstance. Information shall be submitted to the Pitkin County Assessor's Office and will be used for equipment tax determination.
9. The plugging and abandoning of storage well #5 shall be subject to approval of a procedure/plan(s) from BLM, COGCC and the Department of Transportation (PHMSA) prior to commencement of well plugging and abandonment activity.

10. Applicable Garfield County review and permitting for the proposed temporary “man-camp on RMNG-owned property, or any other temporary housing requiring permitting within Garfield County, shall be obtained prior to commencement of well replacement activities.
11. Prior to commencement of well replacement work, the applicant shall provide a copy of all applicable Federal lease agreements for the subsurface storage of gas and current gas storage leases with the Bureau of Land Management below the property, and leases held by RMNG that grant access and usage of the United States Forest Service surface above the leases, to the Pitkin County Development Department.
12. Failure to comply with the conditions of this approval may result in revocation of this approval, or any subsequent Pitkin County permit(s) or approval(s) related to replacement of existing Rocky Mountain Natural Gas storage well numbers 5 and 9 in the Wolf Creek Storage Unit.

NOTICE OF DIRECTOR’S DETERMINATION OF THE FONSI PUBLISHED in the Aspen Times Weekly on the 23rd day of May, 2019.

APPROVED by the Director, this 15th day of May, 2019.



Cindy Houben
Community Development Director

DIRECTOR NOTIFICATION OF FONSI DETERMINATION TO APPLICANT, THE BOARD, COUNTY ADMINISTRATOR, AND COUNTY ATTORNEY, this 15th day of May, 2019.

Exhibit A: Black Hills Amended Application, Supplementary Submission

Exhibit B: Resolution #05-2019 of the Planning and Zoning Commission of Pitkin County, Colorado, Finding the Location & Extent of the Rocky Mountain Natural Gas Proposal for Replacement of 2 Natural Gas Storage Wells (#5 and #9) in the Wolf Creek Storage Field to be in Conformance with the Crystal River Master Plan



Rocky Mountain Natural Gas, LLC dba Black Hills Energy Wolf Creek Well Pad No. 9

Project Summary

The Wolf Creek Well Pad No. 9 storage facility is currently comprised of one natural gas storage well and associated equipment. The well is used to inject consumer-ready natural gas into the storage field all year long when gas is not being withdrawn. Wolf Creek wells typically operate only as injection wells during the warmer months, April through November, and to store gas for utility customers' use during the winter heating season. The moisture content of the natural gas increases while in storage. A dehydrator is located at each well to strip the water from the gas after it is withdrawn and before it is placed back into the natural gas transmission system. There is enough pressure in the storage formation to transport the natural gas into the transmission system without additional compression.

Natural gas stored in the Wolf Creek storage field is processed, customer-ready odorized natural gas. An extended natural gas analysis performed by an independent laboratory and conducted on a sample obtained May 2, 2018 from the Wolf Creek Well Pad No. 9 shows the gas is 95.5 weight percent (wt%) light hydrocarbons consisting of 86.5 wt% methane, 7.7 wt% ethane, and 1.3 wt% propane. Hazardous air pollutants benzene, toluene, ethylbenzene, and xylenes (BTEX) are present in much lower quantities. The combined BTEX composition is 0.014 wt% of the gas. The facility is currently shut-in and no natural gas is being injected into the storage formation or withdrawn for end users in Eagle and Roaring Fork Valley. Rocky Mountain Natural Gas, LLC dba Black Hills Energy will construct two new state-of-the-art storage wells to replace the aging well.

Equipment Description

Current Equipment

- Triethylene Glycol (TEG) Dehydration Unit – 10 MMscfd
- Line Heater
- Triethylene Glycol Storage Tank
- Produced Water Storage Tank
- Methanol Tanks
- Pneumatic Methanol Pumps
- Pneumatic Controllers – to be low bleed controls
- Thermoelectric Generator



Air Quality Equipment Monitoring

Continuous

The site is equipped with continuous natural gas detectors that operate 24x7, 365 days a year and send alarms to gas control once 20% LEL is detected. The detectors are electronic and connected to the site's supervisory control and data acquisition (SCADA) system, which provides real-time information to operations staff located in Glenwood Springs. The monitors are located in the well head, control, and processing buildings. If natural gas is detected, operations staff in Glenwood Springs are notified and a site inspection is conducted. Along with natural gas detectors the well head and line pressures are monitor 24x7, 365 days a year and will send alarms once pressure outside of range is detected.

Weekly

Operations staff visit the site once to three times per week and inspect the equipment and associating piping. Any natural gas leaks from the equipment that are detected using audio, visual, and olfactory inspection are addressed. The consumer-ready natural gas is odorized prior to injection into the storage field. Any natural gas leak at the facility will emit odorant. Inspection logs are maintained to ensure issues are communicated and resolved.

Quarterly

As an added precaution Operations staff performs a quarterly leak inspection utilizing a laser based remote methane leak detector (RMLD). RMLD inspection will not coincide with semi-annual site inspections.

Semi-annual

Constructing the two new storage wells will subject the facility to EPA's New Source Performance Standard OOOOa for natural gas facilities. Semi-annual equipment leak inspections are required. The inspections will be performed using an optical gas imaging (OGI) camera, which can visually detect small methane leaks. The federal performance standard requires repair and resurvey of any discovered leaks. OGI inspections will not coincide with the quarterly site inspections.

Annual

An annual leak survey of the system is performed using an aerial laser based leak detection system.

Ambient Air Sampling

Black Hills Energy will conduct baseline sampling of the existing air quality around Wolf Creek #9 site prior to the start of construction. All sampling will follow a protocol detailing the quality control and assurance standards and which is approved by Pitkin County. A draft protocol is provided as Appendix A. Sampling of methane and non-methane organic compounds (NMOC) will occur upwind and downwind of the facility using appropriate sampling canisters that do not affect sample quality. The canisters will be sent to analytical laboratory for analysis. Black Hills



Energy will test for methane and the following hazardous air pollutants (HAPs): benzene, ethylene benzene, toluene, and xylenes (BTEX).

A follow up sampling event will be conducted within 180 days of completion of construction activities and startup of the new equipment. The sampling will follow the same procedure, including upwind and downwind sampling, used to determine the baseline air quality.

Appendix A **Sampling Protocol**

In accordance with the procedures discussed in this protocol, Black Hills Energy samples the ambient air surrounding the Wolf Creek Well Pad No. 9 natural gas storage site to determine methane, benzene, toluene, ethyl benzene, and xylene concentrations and meteorological data (wind speed/direction, ambient temperature, relative humidity, precipitation, and barometric pressure). The sampling and meteorological monitoring is conducted for one hour and results represent hourly averages.

One or more collection canisters are placed around the site in locations that will represent upwind and downwind pollutant concentrations. The canisters are operated according to the modified *GARCO* [Garfield County, Colorado] *2008 Ambient Air Monitoring Field Protocol*, which is included.

The canister is shipped directly to the operator from the analytical laboratory. At the laboratory, internal analytical standards and frequent verification of analytical system performance are used to control the analytical system. Compendium Method TO-12 includes provisions for inherent quality control in the analysis laboratory. Refer to the laboratory's SOP for *Standard Preparation Using Dynamic Flow Dilution System*, ERG-MOR-061. The operator checks each canister shortly after receipt to ensure it is ready for field use. Any damages to the canisters are noted and addressed accordingly. Canisters that do not meet sampling standards will not be used and returned to the laboratory.

The operator will collect the sample, measure and records vacuum readings before and after canister changes, and document the elapsed time of the data collection period. Specific sampling protocols are documented in the *GARCO 2008 Ambient Air Monitoring Field Protocol* document shown below.

After sample collection, the operator will properly prepare the canisters for shipping and send them to the laboratory. Chain-of-custody forms will be correctly filled out and sent with each sample. The lab will complete their analysis within 30 days of sampling. EPA measurement method TO-12 from EPA's *Compendium of Methods for Determination of Toxic Organic Compounds in Ambient Air* is used to measure hydrocarbon concentrations.



GARCO 2008 Ambient Air Monitoring **Field Protocol**

III. Standard Operation Procedures for Monitoring Hydrocarbons in Ambient Air Using the EPA **Compendium Method TO-12**

Required Equipment:

1. Evacuated TO-Can Canisters
2. Veriflo SC423XL flow controllers

Vacuum Range: 29.9 to 7 in Hg, **Sample Time:** 1440 min (24-hr), **Air Volume:** 4 to 6 L

Sampling Procedure:

Sample Start-up Procedures

1. Begin recording the “Lab Pre-Sample” section of the Sample Data Sheet
 - Sample Location Description
 - Collection Date: The date sample is started
 - Canister Number: Record the number from outside the canister
 - Lab Initial Can Pressure: Will be filled out by lab
 - Date Can Cleaned: Will be filled out by lab
 - Cleaning Batch Number: Will be filled out by lab
 - Duplicate Event: ‘Yes’ or ‘No’ based on the red ‘D’ from the Sampling Calendar
 - Duplicate Can Number: Record canister number from the corresponding duplicate canister
2. Remove gold cap from canister using a wrench. Save and store.
3. Remove silver caps from both ends of the flow controller. Save and store.
4. Connect the flow controller to the canister and tighten screw using a wrench
5. Begin recording the “Field Setup” section of the Sample Data Sheet
 - Operator: Operator’s Last Name and/or Initials
 - Sys#: Leave Blank
 - Setup Date: The date sample was started. Also record time sample was started.
 - Field Initial Can Pressure: Record from pressure meter after flow controller is turned ‘on’
 - MFC Setting: Leave Blank
 - Elapsed Timer Reset: N/A
 - Canister Valve Opened: Write ‘Yes’ after flow controller is turned ‘on’



GARCO 2008 Ambient Air Monitoring Field Protocol (cont.)

6. Set canister on a flat surface approximately ½ to 1 m off the ground
7. Turn dial counterclockwise (on) until a vacuum is established and finish recording information in the “Field Setup” section of the Toxics/SNMOC Sample Data Sheet

Sample Recovery Procedures

1. Begin recording the “Field Recovery” section of the Sample Data Sheet
 - Recovery date: The date sample ended. Also record time sample ended.
 - Field Final Can Pressure: Record from pressure meter before flow controller is turned ‘off’
 - Sample Duration: Write “24” if a successful sample was achieved
 - Elapsed Time: Calculate total elapsed time (min) from start and end times
 - Canister Valve Opened: Write ‘Yes’ after flow controller is turned ‘off’
3. Turn dial clockwise (off) and finish recording information in the “Field Setup” section of the Sample Data Sheet

Non-Air Quality Environmental Monitoring

As required by Federal, State and/or Local regulatory agencies or as established as best management practices (BMPs) by Black Hills Energy (BHE), the following environmental programs are or will be implemented at the Wolf Creek well pad #9. Although BHE does not anticipate well pad #9 causing or contributing to measurable negative environmental impacts, these programs are and will be in place to prevent or identify potential negative impacts to the local environment.

Spill Prevention, Control, and Countermeasure (SPCC) 40 CFR 112

- Applicable tanks and secondary containments will be inspected monthly by a qualified individual or their representative;
- Monthly inspections will be reviewed by the BHE Environmental Services Colorado representative;
- Any necessary actions/repairs/clean ups will be documented and addressed as soon as practical;
- Additionally, monthly SPCC inspections for well pad #9 will include items pertaining to stormwater management (e.g. erosion, sediment control structures and general site conditions and site maintenance)
 - o This is not required by SPCC regulations however, BHE Environmental personnel have proposed to include these items to the monthly SPCC inspection report for well pad #9 to ensure the continued protection of the local environment.



During Construction

- A Stormwater Management Plan (SWMP) for work associated with the construction of dedicated injection wells at well pad #9 will be developed before and implemented during construction at well pad #9. The SWMP will comply with the Colorado Department of Public Health and Environment's (CDPHE) Colorado Discharge Permit System General Permit COR400000. The SWMP will include site maps, inspection requirements, and control measures to ensure appropriate environmental protection is provided during the construction process.
 - o The SWMP will be designed to satisfy the requirements of the Drainage and Erosion Control Plan for Pitkin County.

Groundwater Monitoring

- Black Hills (RMNG) will coordinate with and between permitting agencies to utilize existing information to ensure the groundwater monitoring sampling locations adequately demonstrate the activity does not negatively impact groundwater, including impacts to aquifers and down-gradient users.
- In coordination with the Colorado Oil and Gas Conservation Commission (COGCC), Pitkin County and if applicable the United States Forest Service (USFS); Black Hills Energy will conduct a site visit prior to well construction to identify natural groundwater sources (springs) within ½ mile of well pad #9 for initial, subsequent and continued sampling as required by the COGCC Rule 609 and requested by Pitkin County. Drilling activities will not occur until groundwater sources have been identified and initial baseline samples as outlined below have occurred.
- The number of sample locations shall not exceed four (4) springs and will be based on identified springs located during the pre-drilling site visit.
- Sampling locations shall be surveyed in accordance with COGCC Rule 215.
- On an annual basis, Black Hills (RMNG) and Pitkin County will review groundwater monitoring technology to determine the feasibility of its use at the site for real-time continuous monitoring.

- **General Sampling Program**
 - o Initial sampling shall be conducted at or before the commencement of drilling the first dedicated natural gas storage well and will establish baseline conditions;
 - o Subsequent monitoring: one subsequent sampling event shall be conducted at the initial sample locations between six (6) and twelve (12) months following the completion of the dedicated injection wells;
 - o Subsequent and Continued monitoring:
 - One subsequent sampling event shall be conducted at the initial sample locations between sixty (60) and seventy-two (72) months following the completion of the dedicated natural gas storage wells; and
 - Continued monitoring shall occur on an annual basis. The continued monitoring will satisfy the COGCC Rule 609 requirements and those requested by Pitkin County.



- The continued monitoring as requested by Pitkin County, will not be conducted during peak runoff.
- **Sampling Procedures and Analysis**
 - Sampling and analysis to be conducted at the Wolf Creek well pad #9 will be in conformance with a developed sampling protocol which meets accepted industry standards as described in COGCC Rule 910.b.(2).
- **Initial (Baseline) Sample Analytical Parameters are to include:**
 - pH
 - Specific Conductance
 - Total Dissolved Solids (TDS)
 - Dissolved gases (Methane, Ethane, and Propane)
 - Alkalinity (Total Bicarbonate and carbonate as CaCO₃)
 - Major anions (bromide, chloride, fluoride, sulfate, nitrate and nitrite as N, and phosphorus)
 - Major cations (calcium, iron, magnesium, manganese, potassium, and sodium)
 - Other elements (barium, boron, selenium, and strontium)
 - Presence of bacteria (iron related, sulfate reducing, and slime forming)
 - Total petroleum hydrocarbons (TPH)
 - BTEX compounds (Benzene, Toluene, Ethylbenzene, and Xylenes)
 - Field observations (odor, color, sediment, bubbles, and effervescence)
 - Additional parameters included at the request of Pitkin County include:
 - Hardness
 - Temperature
 - Dissolved Organic Carbon
 - Dissolved Oxygen
- **Subsequent and Continued Sample Analytical Parameters are to include:**
 - pH
 - Specific Conductance
 - Total Dissolved Solids (TDS)
 - Dissolved gases (Methane, Ethane, and Propane)
 - Alkalinity (Total Bicarbonate and Carbonate as CaCO₃)
 - Major anions (bromide, chloride, fluoride, sulfate, nitrate and nitrite as N, phosphorous)
 - Major cations (calcium, iron, magnesium, manganese, potassium, and sodium)
 - Other elements (barium, boron, selenium, and strontium)
 - Presence of bacteria (iron related, sulfate reducing, and slime forming)
 - Total petroleum hydrocarbons (TPH)
 - BTEX compounds (Benzene, Toluene, Ethylbenzene, and Xylenes)
 - Field observations (odor, color, sediment, bubbles, and effervescence)Additional parameters included at the request of Pitkin County include:



- Hardness
- Temperature
- Dissolved Organic Carbon
- Dissolved Oxygen

Reporting

- Analysis reporting required by COGCC will be consistent with the Rule 609 requirements.
- Initial, subsequent and continued annual monitoring analyses will be reported to Pitkin County on an annual basis.
- All sample analysis results will be provided to the appropriate COGCC and Pitkin County representatives via electronic format.

Note:

- With regard to the continued annual sampling requested for by Pitkin County, Black Hills Energy reserves the right to submit a request to Pitkin County to have monitoring and/or analytical parameters reduced when supporting data indicates no impacts caused by well pad #9 dedicated natural gas storage well.

Exhibit B



RECEPTION#: 656276, R: \$0.00, D: \$0.00
DOC CODE: RESOLUTION
Pg 1 of 6, 05/30/2019 at 01:22:05 PM
Janice K. Vos Caudill, Pitkin County, CO

**RESOLUTION OF THE PLANNING AND ZONING COMMISSION OF PITKIN COUNTY,
COLORADO, FINDING THE LOCATION & EXTENT OF THE ROCKY MOUNTAIN
NATURAL GAS PROPOSAL FOR REPLACEMENT OF 2 NATURAL GAS STORAGE WELLS
(#5 and #9) IN THE WOLF CREEK STORAGE FIELD TO BE IN CONFORMANCE WITH THE
CRYSTAL RIVER MASTER PLAN**

Resolution No. PZ-05-2019

RECITALS

1. Rocky Mountain Natural Gas (hereafter referred to as the "Applicant" and as "RMNG") has applied to the Planning and Zoning Commission of Pitkin County ("Planning Commission") pursuant to C.R.S 30-28-110(1), and Land Use Code Section 2-30-30(h)(10), to obtain Location and Extent Review approval to replace two natural gas storage wells on an existing well pad in the Wolf Creek Storage Field.
2. The two new replacement storage wells (#9-D2 and #9-D3,) are deemed to be necessary based upon inspections of existing well numbers 5 and 9, that identified corroded casing and outdated emergency equipment, both of which potentially posed public safety and environmental concerns;
3. The new replacement wells will be drilled and completed on existing well pad #9.
4. The well pad is located in the Wolf Creek Storage Unit on Federal Lease #COC0007498, on U.S. White River National Forest Service land, off of Garfield County Road 117 (Four Mile Road) and Forest Service Road 321. It is located at the NESW Section 36/T8S/R90W/6PM in Pitkin County.
5. The Wolf creek natural gas field was first established in 1961. It produced steadily until 1973 when natural gas was depleted, and it was converted to a natural gas storage field. It has operated as a storage field continuously for the past 45 years.
6. The federal mineral lease on which the well is located is zoned RS-30, and contains 2,200 acres.
7. No new roads will be necessary to access the existing well pad.
8. Replacement wells will continue to serve existing natural gas demand in the Roaring Fork Valley.
9. The Community Development Director approved Administrative Decision No.029-2019, determining that a Finding of No Significant Impact (FONSI) is warranted for the drilling and completion of natural gas replacement storage well numbers 9D-2 and 9D-3 on existing well pad #9 in the Wolf Creek Storage Unit, finding that the location and use are unlikely to have any significant adverse impact to Pitkin County.
10. The Planning Commission reviewed the application at a duly noticed public hearing on March 19th, 2019, at which time evidence and testimony were presented with respect to this application.
11. The Planning Commission finds that the proposal is in conformance with the Crystal River Master Plan, as follows:

- A. The proposal is consistent with the Plan objective of protecting and preserving the natural environment;
- B. The proposal is consistent with the Plan objective to preserve, protect and monitor surface and groundwater quality and quantity within the Crystal River watershed;
- C. The proposal is consistent with the Plan objective to preserve and protect air quality;
- D. The proposal is consistent with the Plan objective of addressing climate change and preparedness including effective wildfire management strategies;
- E. The proposal is consistent with the Plan objective to reduce the impacts from heavy truck traffic including noise, traffic level and environmental degradation.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission hereby finds that the Location and Extent Review of the proposed Rocky Mountain Natural Gas replacement of two natural gas storage wells (#5 and #9) on existing well pad #9 in the Wolf Creek Storage Field, is in conformance with the Crystal River Master Plan, subject to the following conditions:

- 1. The Applicant shall adhere to all material representations made in the application and in written and verbal communication, and shall consider those representations to be conditions of approval, unless amended by other conditions.
- 2. Regarding Water Sampling:
 - A. The applicant shall follow the Colorado Oil and Gas Conservation Commission (COGCC) Rule 609 for groundwater sampling with the additional requirements:
 - a. An annual sample, not during peak runoff, shall be required after the initial 3 required samples outlined in Rule 609.
 - b. Samples shall also include hardness, alkalinity, temperature, dissolved organic carbon, and specific conductance.
 - c. All analytes required in the baseline sampling shall be included in subsequent samples.
 - d. Location for sampling shall be determined prior to commencement of work, subject to a site visit with County Environmental Health Dept. Staff to determine the groundwater sampling locations in coordination with the BLM and USFS.
 - B. Prior to, during, 30-days after completion of the well re-drilling and then on an annual basis (but not during peak runoff), the applicant shall sample surface water at each location for:
 - a. The analytes listed in COGCC Rule 609
 - b. Hardness, alkalinity, temperature, dissolved oxygen, dissolved organic carbon, and specific conductance
 - c. All analytes required in the baseline sampling shall be included in subsequent samples to provide consistency with baseline data used to establish Gold Medal Waters status on North Thompson Creek.
 - d. A minimum of 1 sampling location per well

- e. Location for sampling shall be determined prior to commencement of work, subject to a site visit with County Environmental Health Dept. Staff to determine the surface water sampling locations in coordination with the BLM and USFS.
3. Regarding Emergency Operations Plan: Prior to commencement of drilling and completion operations for well replacement, the applicant shall file emergency operations plans required by the USFS/COGCC and/or BLM with the Pitkin County Emergency Manager in the Pitkin County Sheriff's Office.
 4. Regarding Air Quality Leak Monitoring and Ambient Air Quality Sampling, the applicant shall implement the following standards and protocol as described below:
 - A. Wells and associated equipment will be subject to US EPA New Source Performance Standard Subpart OOOOa—Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015. In accordance with the federal regulation §60.5397a, an inspection and repair plan will be developed and implemented for each well. The leak inspection equipment, leak surveys, and leak repairs will be recorded and reported in accordance with Colorado and US EPA record-keeping requirements.
 - B. Ambient Air Quality samples shall be obtained in accordance with COGCC and/or BLM requirements for well drilling and completion activities. Sampling ambient air quality in subsequent years shall be on an annual basis unless additional sampling is determined to be necessary by Pitkin County. The schedule for additional ambient air quality sampling will be determined by Pitkin County.
 - 1) Grab sample protocol and analyses may be based on Garfield County's sampling protocol. Pitkin County Public Health/Environmental Health Staff will coordinate with CDPHE or Garfield County on analytes and protocol for sampling including sampling frequency requirements and whether sampling can be coordinated with Garfield County and/or Federal Agencies in coordination with RMNG to achieve efficiencies and comprehensive data.
 - 2) There shall be a minimum of one sample per well site.
 - 3) Location of sampling site is to-be-determined subject to a site visit by County Staff and/or consultants for final location approval, prior to commencement of work on new wells.
 5. General Comments for Air and Water Sampling
 - A. The written and oral representations of the applicant's agents and employees were relied upon in the development of these sampling protocols. The applicant is held to such representations and Pitkin County reserves the right to make changes to these sampling protocols if alternative methods, instruments, or technology are determined by Pitkin County to provide more accurate information.
 - B. All sampling data produced on site shall be shared with Pitkin County within 30 days of sampling.

- C. Pitkin County shall be contacted a minimum of 30-days prior to a sampling event to allow the County an opportunity, if desired, to schedule staff to attend the sampling event for verification purposes.
 - D. In the future, Pitkin County reserves the right to ask for an increase in sampling frequency and locations in the air, surface water, and/or groundwater based on additional wells being drilled/re-drilled in Pitkin County, and/or contamination/pollution identified.
6. Prior to use of haul routes for purposes of drilling and/or completing well #s 9 D-2 and #9 D-3 and/or for hauling water to and/or from the site, the applicant shall obtain consent or permits, as applicable, from the U.S. Forest Service, Colorado Dept. of Transportation, Garfield County, the Town of Carbondale and the City of Glenwood Springs for use of their respective roads to ensure that construction management, timing constraints, weight limits, safety and environmental considerations, dust maintenance and potential impacts to neighborhoods are addressed to the satisfaction of each respective jurisdiction.
7. The applicant's operating procedures shall incorporate the following measures to support wildlife habitat and use identified by Colorado Parks and Wildlife:
- A. Timing limitations for Elk Production areas, as per Colorado Parks and Wildlife (CPW), is May 15 through June 15. RMNG shall not begin work on well replacement until or after June 16, to comply with the timing stipulation for the Production Area.
 - B. Only Bear-proof trash receptacles shall be used on site during all active operations.
 - C. Night lighting at the construction site shall be avoided to the maximum extent possible, while maintaining a safe working environment.
 - D. Pets shall be prohibited from being on-site during the duration of the well-replacement project.
 - E. RMNG shall notify and communicate with the CPW staff as soon as possible (at most within 24 hours) of any wildlife conflicts that occur during this project.
 - F. Given the nearby cutthroat trout habitats, secondary containment for all fluids and fuels stored on-site shall be achieved by means of being inside a building with concrete floor and building containment, double walled tanks/vessels that are periodically monitored and/or metal containment basins.
8. To protect vegetation in close proximity to roads used to access the site, the applicant shall water roads with fresh water only, to address dust from traffic during drilling and completion of wells.
9. The applicant shall purchase and haul water from the City of Rifle, or other municipality downstream of Pitkin County for all operations related to drilling and completion.
10. Hauled water, if not used in the drilling or completion process, shall be disposed off-site at a commercial facility approved subject to applicable State and/or Federal requirements.

11. Prior to commencement of drilling and well operations, the applicant shall provide copies of all approved federal, state and local permits required for operations, to the Pitkin County Community Development Department.
12. Prior to commencement of operations, the applicant shall provide an equipment list and number of days equipment will be on-site for well completion. The applicant shall specify whether replacement wells will be new wells or work-over of existing wells, and name the drilling rig operator(s) under either circumstance. Information shall be submitted to the Pitkin County Assessor's Office and will be used for equipment tax determination.
13. The plugging and abandoning of storage well #5 shall be subject to approval of a procedure/plan(s) from BLM, COGCC and the Department of Transportation (PHMSA) prior to commencement of well plugging and abandonment activity.
14. Applicable Garfield County review and permitting for the proposed temporary "man-camp" on RMNG-owned property, or any other temporary housing requiring permitting within Garfield County, shall be obtained prior to commencement of well replacement activities.
15. Prior to commencement of well replacement work, the applicant shall provide a copy of all applicable Federal lease agreements for the subsurface storage of gas and current gas storage leases with the Bureau of Land Management below the property, and leases held by RMNG that grant access and usage of the United States Forest Service surface above the leases, to the Pitkin County Development Department.
16. Failure to comply with the conditions of this approval may result in revocation of this approval, or any subsequent Pitkin County permit(s) or approval(s) related to replacement of existing Rocky Mountain Natural Gas storage well numbers 5 and 9 in the Wolf Creek Storage Unit.

NOTICE OF THE PUBLIC HEARING PUBLISHED IN THE ASPEN TIMES WEEKLY ON THE 15th DAY OF NOVEMBER, 2018.

FOUND IN CONFORMANCE WITH THE CRYSTAL RIVER MASTER PLAN by the Planning Commission this 19th Day of March, 2019.

PLANNING AND ZONING COMMISSION
OF PITKIN COUNTY, COLORADO

Joseph Krabacher
Joe Krabacher, Chair

May-21-2019

Date

ATTEST:

Bonnie Shiles

Bonnie Shiles, Administrative Assistant

APPROVED AS TO FORM:



~~John Ely~~, County Attorney

Asst.
Richard Y. Nesley III

APPROVED AS TO CONTENT:

Cindy Houben

Cindy Houben, Community Development Director