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2619193 here.



Filled under 2619193



Eric Permut
15492 County Road 6
Fort Lupton, CO 80621
eric.permut@gmail.com

August 1, 2018

Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

ORIGINAL

To whom it may concern,

I would like to express my objection to the proposed petroleum wastewater injection well, ROY SWD #3, by NGL Water Solutions, LLC. in section 28-T1N-R66W, and request a commission hearing.

The location of the proposed injection well is in close proximity to numerous residences that rely on subsurface aquifers for domestic and agricultural water. While many injection wells operate without incident, I believe the contamination risk of subsurface wastewater injection is significant.

The past incidences of containment violations in wastewater injection and the contamination potential are extremely concerning. I am not confident that engineering and regulation can effectively protect aquifers from subsurface waste injection. "From late 2007 to late 2010, one well integrity violation was issued for every six deep injection wells examined" and "EPA data shows that in the three years analyzed by ProPublica, more than 7,500 well test failures involved what federal water protection regulations describe as 'fluid migration' and 'significant leaks.'"

I believe subsurface waste injection is an irresponsible practice. The process relies on assumptions about the increasingly-complex subsurface and not enough is known about the behavior of contaminant plumes at depth and the long-term health effects of compounds in petroleum extraction wastes.

Thank you for your consideration,

Eric Permut

Source:

Lustgarten, A. (2012) Injection Wells: The Poison Beneath Us. ProPublica.

Retrieved July 27, 2018, from <https://www.propublica.org/article/injection-wells-the-poison-beneath-us>



COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

August 23, 2018

Mr. Eric Permut
15492 County Road 6
Fort Lupton, CO 80621

Dear Mr. Permut,

This letter is to acknowledge receipt of your letter dated August 1, 2018. In your letter you request a hearing before the Colorado Oil and Gas Conservation Commission regarding the proposed NGL Water Solutions DJ, LLC Roy SWD #3 well. The Surface location for the proposed well is in Section 28 Township 1 North Range 66 West of Weld County.

At this time the Colorado Oil and Gas Conservation Commission has not received permit applications from NGL Water Solutions DJ LLC for the Roy SWD #1 through Roy SWD #4 wells. Therefore we feel it is premature to proceed with processing your request for a hearing.

We are requiring NGL to send a second letter to you and fellow mineral and surface owners at the same time they file formal permit applications. At that time you can resend your letter. COGCC recommends that you send us a second letter of protest to ensure your request is considered with the applicable permit application.

Please be aware that in order to be granted a hearing before the Commission, you must submit a detailed written explanation of how the construction and injection into this proposed well would harm nearby water wells, surface water, and/or groundwater. Your reasons must be specific. We recommend you hire legal counsel to prepare your statement and represent you before the Commission.

Please feel free to contact me if you have further questions.

Sincerely,

Robert P. (Bob) Koehler, PhD.
UIC Lead, Geology Advisor

Telephone: 303-894-2100 x5147

Email: bob.koehler@state.co.us



Not used see
2619193 here.



Eric Permut
15492 County Road 6
Fort Lupton, CO 80621
eric.permut@gmail.com

September 24, 2018

Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Dear Commissioners,

I would like to protest the proposed Roy Swd facility by NGL Water Solutions DJ LLC. The injection facility is an incompatible land use with the surrounding horse properties and homes, the estimated 175 wastewater tanker round trips per day would be a safety risk on the dangerous curve that NGL has selected for their access point, and spills and contaminated stormwater could reach the South Platte River basin.

Should the facility permit be approved, I request that NGL be required to extend the injection well surface casings sufficiently into the Pierre Shale to help protect the Laramie-Fox Hills aquifer upon which most of the surrounding households depend for drinking water.

Thank you for your consideration,

Handwritten signature of Eric Permut.

Eric Permut

WALTERS S. FEES, JR. AND SON OIL & GAS, LLC

OIL & GAS EXPLORATION AND DEVELOPMENT
2516 FORESIGHT CIRCLE, ROOM #10
GRAND JUNCTION, COLORADO 81505

GRAND JUNCTION 815

24 SEP 2018 PM 3:1



→ Bob Kessler

Colorado Oil & Gas Conservation
1120 Lincoln Street
Suite 801
Denver, CO 80203

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COLORADO

Oil & Gas Conservation
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

September 28, 2018

Ms. Ellen Oman
P.O. Box 337
Brighton, CO. 80601

Mr. Eric Permut
15492 County Road 6
Fort Lupton, CO 80621

Ms. Jeri Yarbrough
14512 County Road 6
Fort Lupton, CO 80621

Anadarko Petroleum Corporation
Attn: Mr. Brandon McGraw, Landman
1099 18th Street, Suite 1800
Denver, CO. 80202

Dear Ms. Oman, Mr. Permut, Ms. Yarbrough, and Mr. McGraw,

The Colorado Oil and Gas Conservation Commission (“Commission”) has received your requests to have the Commission hold a hearing in regard to permitting multiple commercial saltwater disposal wells proposed by NGL Water Solutions DJ, LLC (“NGL”) in Weld County, Colorado. As per Rule 325.m, those requesting a public hearing before the Commission must be “directly and adversely affected or aggrieved” by the proposed application. Written protests must specifically provide information on the following:

- (1) Possible conflicts between the injection zone’s proposed use and present or future use as a source of drinking water or present or future use as a source of hydrocarbons, or
- (2) Operations at the well site which may affect potential and current sources of drinking water.

These written requests should be submitted to the Hearings Manager, Julie Prine, at Julie.Prine@state.co.us, no later than Friday, October 12, 2018 at 5:00 PM. You are encouraged to retain legal counsel to assist you with this process.

If the Director determines that your request provides all necessary information under the rules, a hearing will be set and you will be notified.

P 303.894.2100 F 303.894.2109 www.colorado.gov/cogcc

Commissioners: John H. Benton - Chair, Howard Boigon - Co-Vice Chair, Tommy Holton - Co-Vice Chair,
Ashley L. Ager, James W. Hawkins, Kent Jolley, Erin A. Overturf, Robert W. Randall, Karin McGowan
John W. Hickenlooper, Governor | Robert W. Randall, Executive Director, DNR | Julie Murphy, Director



September 28, 2018

Page 2

As I have previously conveyed, at the time you initially expressed concern over the proposed wells, NGL had not yet formally filed applications for most of the wells in question, making it impossible for us to move forward on your requests. NGL submitted the necessary permit applications in late August through early September. The wells and documents in question are listed at the end of this letter.

Please contact me if you have any questions. A telephone call or an email should get you a quicker response.

Sincerely,



Robert Koehler, PhD.
UIC Lead, Geology Advisor

Telephone: 303-894-2100 x5147
Website: <http://cogcc.state.co.us/#/home>

Email: bob.koehler@state.co.us

Cc:

Ms. Julie Murphy, Director
Ms. Julie Prine, Hearings and Regulatory Affairs Manager
Mr. James Rouse, Hearings Supervisor

See attached sheet for additional information.

South Weld SWD #1
South Weld SWD #2
South Weld SWD #4

Roy SWD #1
Roy SWD #2
Roy SWD #3
Roy SWD #4
Roy SWD #5

Well Name	Type of Well	Surface	Bottomhole	Form 2	Form 2A	Form 31	Form 33
South Weld SWD #1	Vertical			401574842	401575754	401600785	401602089
South Weld SWD #2*	Directional	902 FNL 1709 FEL, 30-1N-66W	1277 FSL 2638 FEL, 19-1N-66W	401755785	401756363	401756412	401756433
South Weld SWD #3		No such well proposed.					
South Weld SWD #4	Directional	1655 FNL 1713 FEL, 30-1N-66W	259 FNL 2217 FEL, 31-1N-66W	401576086	401575754	401600785	401662714

*Refile with revised bottomhole.

Roy SWD Facility (for 5 wells)							
Roy SWD #1	Vertical	326 FNL 2077 FEL, 28-1N-66W	Same	401715613	401715678	401719855	401720052
Roy SWD #2	Directional	301 FNL 2077 FEL, 28-1N-66W	1668 FNL 2323 FEL, 21-1N-66W	401720976	401715678	401719855	401721084
Roy SWD #3	Directional	935 FNL 2169 FEL, 28-1N-66W	2327 FSL 942 FWL, 27-1N-66W	401722130	401722226	401719855	401722281
Roy SWD #4	Directional	301 FNL 2127 FEL, 28-1N-66W	1319 FNL 420 FEL, 29-1N-66W	401724848	401715678	401719855	401725366
Roy SWD #5	Directional	326 FNL 2127 FEL, 28-1N-66W	1753 FSL 1 FWL, 21-1N-66W	401759419	401715678	401719855	401759646

SWD refers to "Salt Water Disposal"	Distances in Feet	XX-1N-66w
	FNL=From North Line of Section	XX = Section 1 through 36
	FSL=From South Line of Section	1N = Township 1 North
	FEL=From East Line of Section	66W = Range 66 West
	FWL=From West Line of Section	Public Land Survey System
		All 6th Prime Meridian

Similar colors mark documents used for more than one well.

Form 2 is the drilling permit.
Form 2A is the surface facility permit (has to be supplemented with County permit).
Form 31 permits use of an underground formation or formations as a tank for disposing of produced water.
Form 33 permits the well that connects the "tank" defined in the Form 31 to the surface.

Note: Forms 31 and 33 have two parts.

The Forms 31 and 33 "Intent" are plans based on a hypothetical well. An approved "Intent" does not allow injection.
The Forms 31 and 33 "Subsequent" are based on a final physical well as constructed or converted. Approval for injection goes with a "Subsequent" 31 and 33.