

January 27, 2021

Mr. Rick Allison
Colorado Oil and Gas Commission
1120 Lincoln Street
Denver, CO 80203

Subject: **Noncompliance Notification & Discharge Monitoring Report for December 2021 for Wellington Operating Co. – COGCC Permit Numbers 281818, 281824, & 416077**
Submitted electronically

Dear Mr. Allison:

Attached please find the Discharge Monitoring Reports (DMRs) for the subject Wellington Operating Company (WOC) facility for December 2021.

The facility did operate and discharge treated wastewater during the month of December 2021. A compliance sample was collected and analyzed during December 2021 and the laboratory data is attached. As expected, the barium and fluoride exceed the new discharge limits but the month of December is within my compliance schedule. No other analyzed parameters exceeded their discharge limits at Outfall 001A.

The December 2021 Outfall 001A sample analyzed for PFAS. This sample will be reported as a separate submittal when the revised EDD file is received from the laboratory. The analysis detected the following reportable PFAS parameters at the indicated result:

Parameter	Result
Perfluorooctanoic Acid (PFOA)	0.79 ng/L
Total Combined	0.79 ng/L

Combined Limit 70 ng/L; results is not a permit exceedance for PFAS.

Parameter	Result
Perfluorohexanesulfonic Acid (PFHxS)	1.0 ng/L

Individual Permit Limit 700 ng/L; results in no permit exceedance.

Monthly samples were collected and analyzed from the existing five monitoring wells and the laboratory data is attached.

Noncompliance Notification Required by;

PART II, A. Management Requirements, 3. Noncompliance Notification;

The December 2021 Outfall 050B sample analyzed for chloride detected the following result:

Parameter	Result
Chloride	290 mg/L

Permit Limit 250 mg/L; results in a permit exceedance for chloride.

a) If, for any reason, the permittee does not comply with or will be unable to comply with any discharge limitations or standards specified in this permit, the permittee shall, at a minimum, provide the Oil and Gas Conservation Commission, the Water Quality Control Division, and with the following information:

(i) A description of the discharge and cause of noncompliance;

WOC Response – The chloride levels at the monitoring well have increased during the past couple months. This is suspected due to a higher rate of infiltration from the RIB’s. The chloride may be accumulating near the well. Decreasing water table level at the monitoring well may be resulting in higher concentrations of treated water at the monitoring well.

(ii) The period of noncompliance, including exact dates and times and/or the anticipated time when the discharge will return to compliance; and

WOC Response – The we are unable to determine exact dates or times that the condition occurred. The analysis of the November sample was in compliance and the sample in December exceeded the limit. The analysis of a sample collected during the first week of January is pending.

(iii) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge, including, but not limited to temporary suspension of discharge.

WOC Response - WOC is taking the following steps to prevent exceedances in the PFAS discharge from the facility;

- 1. WOC will reduce the amount of sodium hypochlorite used to control biofouling in the filtration equipment until the reverse osmosis system is installed.**
- 2. Installing a reverse osmosis filtration system to treat the wastewater will remove a significant amount of chloride from the treated wastewater resulting in lowering the chloride level at Outfall 050B once the system has flush.**

b) The permittee shall report the following instances of noncompliance orally within twenty-four (24) hours from the time the permittee becomes aware of the noncompliance, and shall submit to the COGCC a written report on COGCC Form 19 Initial Spill/Release Report within seventy-two (72) hours after becoming aware of the noncompliance:

WOC Response – This Section does not apply

(i) Any instance of noncompliance which may endanger health or the environment regardless of the cause of the incident;

(ii) Any unanticipated bypass;

- (iii) Any upset or spill which causes an exceedance of any effluent limitation in the permit;
(iv) Daily maximum violations for any toxic pollutants or hazardous substances limited by PART I-A of this permit and specified as requiring 24-hour notification.

- c) The permittee shall report all other instances of non-compliance which are not required to be reported within 24 hours at the time Discharge Monitoring Reports are submitted. The reports shall contain the information listed in sub-paragraph (a) of this section.

WOC Response –This report is providing the information on the noncompliance.

As requested, WOC has prepared and attached a copy of a water balance sheet for the Wellington Produced Treatment facility and the Wellington Muddy Sand Stone Unit – South Battery for December 2021. This water balance is being submitted voluntarily and is not required by the current discharge permit.

Mr. Randy Evans is the current operator in responsible charge for the facility.

If you have questions regarding facility operations, please contact Randy Evans at cell 970-402-0418; email: rgrevans477@gmail.com.

Sincerely,

A handwritten signature in black ink that reads "Randy Evans". The signature is written in a cursive, slightly slanted style.

Randy R. Evans
Operator in Responsible Charge