
From: Neumann - DNR, Danielle <danielle.neumann@state.co.us>

Sent: Tuesday, June 15, 2021 1:58 PM

To: nick@cpxpiceance.com

Cc: Taylor Elm - DNR <taylor.elm@state.co.us>; ByBee - DNR, Travis <travis.bybee@state.co.us>; Bryan Clark <bryan@cpxpiceance.com>; gwen.brodsky@aota.tech; Kent Rider <kentridger@hotmail.com>

Subject: Re: CPX - Variance Request

Hello Again,

Here is CPW's statement regarding TPR Pad 25A. After reviewing the presentation you gave to us on May 27, I decided to type up the BMPs for easy reference. I know these will be detailed in your package but more documentation is better than less! Please let us know if you have any questions.

This serves as CPW's written waiver for the continued use of Pad 25A, portions of which are affected by Rule 1202.c.(1).R (cutthroat trout designated crucial habitat). CPW staff visited this location on May 27, 2021, to determine if a waiver was appropriate. CPW incentivizes the use of already disturbed locations when no adverse impacts are anticipated. Construction at a new location, instead of continued use of Pad 25A, would cause more undesired disturbance and pose more risk to High Priority Habitats and the watershed. Pad 25A's location boundary and access road will not expand. CPX has proposed a list of 10 BMPs to avoid adversely impacting Beaver Creek, aquatic habitat, and the watershed. CPW may issue a waiver, with the application of prescribed BMPs, per rule 309.e.(5).D. CPW expects these measures to be sufficient and supports the continued use of Pad 25A.

Spill Protection

- To protect against spills from the well pad, existing well pad fill slopes have 2' high earthen berms compacted to 95% soil/moisture density. The outside slopes of the berms have 80% vegetative cover. The berms are stable with high structural integrity.
- To protect against spills from tanks, steel secondary containment is sized to 150% of the largest tank. The secondary containment liner is sprayed in to optimize its seal. Spill response material is permanently stored on Pad 25. TPR has not experienced a spill to date.

Stormwater Protection

- To protect against runoff, there is no uncontrolled stormwater on the well pads. Well pads have 6" drains in the center. The drain is piped outside of the berm to a lined trench. The trench drains to a lined catchment. Solids settle in the catchment for removal. The stormwater evaporates.
- To protect against erosion, the road has a borrow ditch on the upslope side. Stormwater is diverted to 18"-24" culverts spaced at 600' intervals. Frequent culverts prevent erosion by avoiding long runs of stormwater and slowing velocity.

Stream Protection

- To protect Beaver Creek, the road crossing was designed in consultation with the USACE. It is an open bottom arch with concrete footers to maintain the streambed integrity.
- To protect Beaver Creek, process equipment and tank loadout were relocated to Pad 2, approximately 3 miles away.
- To protect Beaver Creek, the water pipeline was designed to be bidirectional. Delivering freshwater to TPR by pipeline eliminates haul traffic for water delivery.
- To protect Beaver Creek, no proppant is anticipated for future well development, which eliminates haul traffic for proppant.

Inspections

- To minimize potential for undetected spills, runoff, and pipeline leaks, personnel are on site approximately 5 days/week. Field staff live within 15 minutes of the well pads, which facilitates consistent on-site presence.
- Pipelines are monitored for pressure loss and are tested annually.

Thank you,

Danielle Neumann
Land Use Specialist
Northwest Region



C: [970-366-1223](tel:970-366-1223)

0088 Wildlife Way Glenwood Springs CO 81601