**From:** Taylor Elm - DNR
**To:** Katy Middleton
**Cc:** Wayne Bankert; Molly West - DNR
**Subject:** Re: CPW Waiver Request for Laramie Energy"s Currier BCU 0993-16-07
**Date:** Wednesday, July 19, 2023 2:33:04 PM



Katy,

Thank you for providing this very detailed waiver request document for the Currier BCU 0993-16-07 pad location. CPW appreciates the compilation of all information and best management practices that we had discussed during our June 12, 2023 on-site tour of the proposed location. After reviewing the waiver request document, CPW agrees to waive the application of Rule 1202.a.(3). under the authority provided by Rule 1202.a. For the following reasons, CPW supports waiving this rule requirement:

1. The distance and vegetative buffer between the pad location and nearest drainages is sufficient to significantly reduce the risk of any potential spills or releases from this proposed pad site to nearby waterways.
2. Implementation of professionally-designed stormwater and erosion control measures will adequately contain sediment and potential spills or releases to the pad site, and in a worst case scenario, within the re-designed borrow ditch along the access road below the pad location.
3. Placement of emergency spill response kits and remote monitoring and shut-in technologies will further mitigate risks associated with fuel and chemical storage areas within 500 ft of the identified waterways.

Additionally, CPW appreciates Laramie's commitment to utilizing only freshwater for dust control measures within 300 feet of the ordinary high water mark of these identified drainages. Please consider this email as CPW's formal waiver approval. If there are any questions or needs for additional information, please feel free to reach out.

Sincerely,

**Taylor Elm**

**Northwest Region Energy Liaison**

P 970.947.2971 | **C 970.986.9767**
711 Independent Ave. Grand Junction, CO 81505
taylor.elm@state.co.us | cpw.state.co.us

On Mon, Jul 17, 2023 at 8:01 AM Katy Middleton <kmiddleton@laramie-energy.com> wrote:

> Greetings Taylor,
>
> Please find attached the waiver request for Laramie's proposed Currier BCU 0993-16-07. Please do not hesitate to contact me with any questions. Thank you for your time and consideration.
>
> Best Regards,
>
> **Katy Middleton | Regulatory Specialist**
>
> 760 Horizon Drive, Suite 101
> Grand Junction, CO 81506
> kmiddleton@laramie-energy.com
> Cell: 970.985.8240

**Laramie Energy LLC**
1700 Lincoln Street, Suite 3950
Denver CO 80203

TEL: (303) 339-4400

July 17, 2023

Mr. Taylor Elm
NW Region Energy Liaison
Colorado Parks and Wildlife
711 Independent Ave.
Grand Junction, CO 81501

RE: **CECMC Rule 1202.a.(3) Waiver Request**
Location Name: Currier BCU 0993-16-07
OGDP Title: 2023 Currier BCU 0993-16-07 OGDP
Location ID: New Location
Legal Description: SWNE of Section 16, Township 9 South, Range 93 West, 6th P.M.
Location Coordinates: Latitude: 39.277789°; Longitude: -107.773701°
Elevation: 7456 feet
County: Mesa

Mr. Elm,

Laramie Energy, LLC (Laramie) is in the process of preparing an Oil and Gas Development Plan (OGDP) to submit to the Colorado Energy and Carbon Management Commission (referred to hereinafter as CECMC or the Commission). Laramie is pursuing an OGDP to permit a new Oil and Gas Location, the Currier BCU 0993-16-07 well pad, in Mesa County, Colorado. Laramie is proposing to drill twenty-three (23) new directional natural gas wells.

The proposed location will include the construction of a well pad, site-specific access road, and buried pipeline. Laramie will utilize temporary surface water gathering lines for completions and flowback only. The proposed Area of Disturbance will be 9.0 acres and the Working Pad Surface (WPS) will be 4.1 acres. The project will result in a total of 10.9 acres of short-term disturbance, including 0.9 acres for pipeline installation within an existing pipeline corridor. Once the pipelines are installed, the disturbance will be immediately reclaimed.

Construction of the Currier 16-07 site-specific access road will result in 1.0 acres of new disturbance to construct a segment of road to connect to existing private lease roads. Approximately 883 feet of new access road would be constructed to access the subject well pad.

The site's location is within Laramie's North Vega operations area and will be tied into existing infrastructure to minimize dust and traffic impacts. Laramie facilities in the area will support operations at the Currier BCU 0993-16-07. Laramie will utilize a closed-loop drilling system at the Currier BCU 0993-16-07, using only water-based bentonite drilling fluids, to drill the twenty-three (23) new directional natural gas wells.

Interim reclamation would commence within 6 months (weather permitting) after all wells are drilled and completed and production facilities are installed on pad. During interim reclamation, the cut and fill slopes will be reshaped and contoured, reclaiming approximately 6.9 acres. The long-term disturbance

associated with this pad will be 3.1 acres for the production phase (2.1 acres for Production Pad Surface and 1.0 acres for the access road). The site would be seeded with a seed mix approved by the Surface Owner or a mix approved by the Bureau of Land Management for the plant community for the altitude.

**HIGH PRIORITY HABITAT**

The Currier BCU 0993-16-07 is not located within any areas identified as High Priority Habitat (HPH) (CECMC 2023). Aquatic sportfish management waters exist within 1-mile of the Currier BCU 0993-16-07. At the nearest point, the Currier BCU 0993-16-07 WPS is 1,192 feet upgradient of the "Aquatic Sportfish Management Water" HPH buffer. There are no other mapped HPH within one mile of the proposed Currier 16-07.

**WAIVER REQUEST**

Laramie is requesting a waiver from CECMC Rule 1202.a.(3). *At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland.*

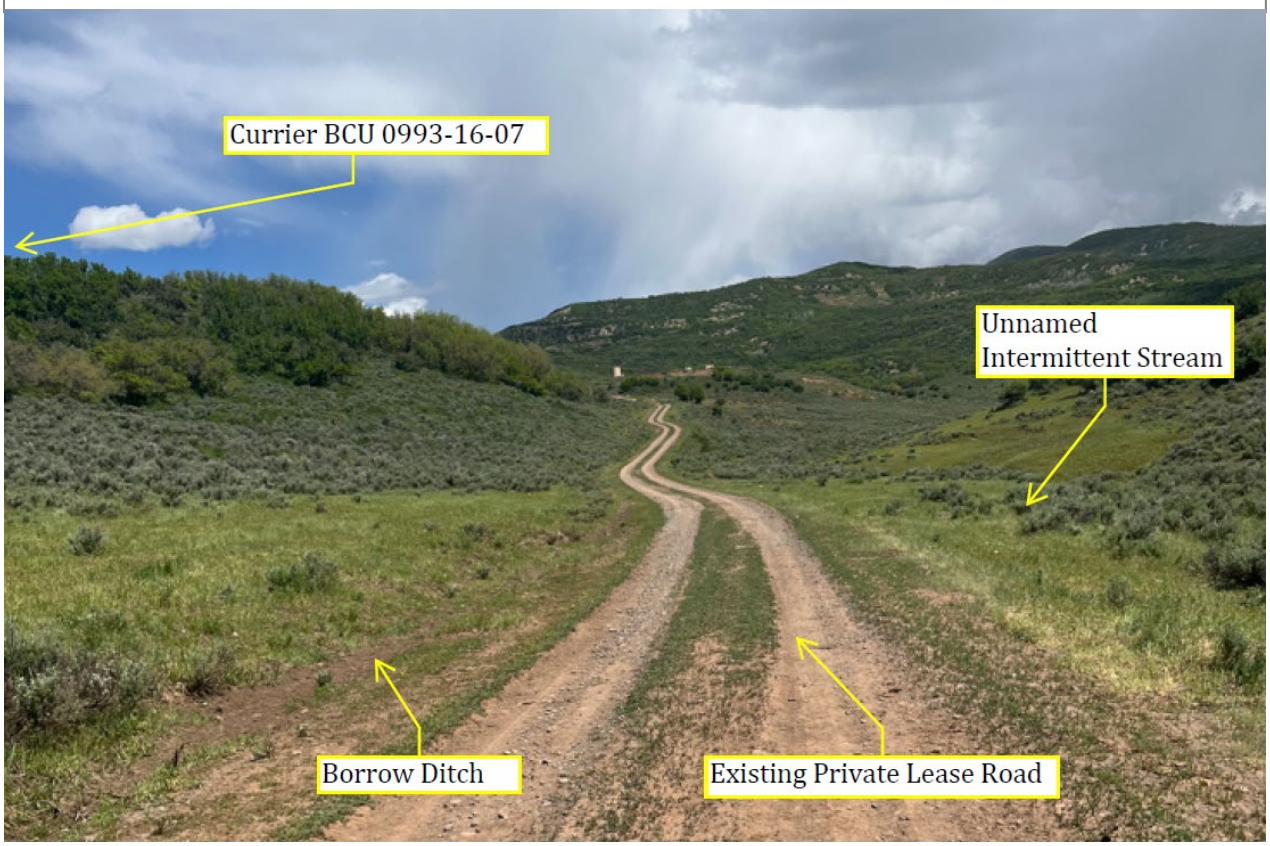
The Currier BCU 0993-16-07 is located within 500 feet of two downgradient unnamed surface water features: an ephemeral drainage and an intermittent stream. Due to the topography and distances of the ephemeral drainage and an intermittent stream, Laramie is unable to locate chemical storage and all refueling outside of the 500 ft buffer.

Laramie seeks a waiver to allow refueling during drilling activities and chemical storage during pre-production and production phases within 500 feet of these surface water features. WestWater Engineering, Inc. (WestWater) conducted a High Priority Habitat Assessment and Wetlands Evaluation in 2023. WestWater field-verified that no wetlands are directly downgradient (within 500 feet) of the Currier BCU 0993-16-07. The HPH Assessment and Surface Hydrology Maps (dated June 2023) are provided.

At the nearest point, the unnamed intermittent stream is located 476 feet from the WPS to the east and the unnamed ephemeral drainage is located 487 feet from the WPS to the northwest. The existing private lease access road to is located between the Currier BCU 0993-16-07 and the unnamed drainages. Established vegetation consisting of mixed mountain shrublands, grasses, and forbs exists between the Currier BCU 0993-16-07 and the unnamed drainages as well.

**Photo 1. Facing Northeast - Unnamed Ephemeral Drainage within 500 feet of Currier BCU 0993-16-07**

**Photo 2. Facing North – Unnamed Intermittent Stream within 500 feet of Currier BCU 0993-16-07**




**LEAK DETECTION MONITORING**

During drilling, completions, and flowback operations, personnel will be located onsite fulltime (24 hours a day, seven days a week). The consistent presence of personnel on location will allow for fluids to be continuously monitored. During production, tanks will be equipped with dedicated continuous monitoring through a SCADA platform at the Currier BCU 0993-16-07 for remote monitoring, alerting, and shut-in capabilities. Laramie's SCADA system, which provides real-time fluid level data, will allow for continuous monitoring of tank volumes.

**TABLE 1. PROPOSED PRODUCTION TANKS**

| OIL TANKS | | | PRODUCED WATER TANKS | | | GUNBARREL TANKS | | |
|---|---|---|---|---|---|---|---|---|
| # Of Tanks | Barrels | | # Of Tanks | Barrels | | # Of Tanks | Barrels | |
| | Vol. Per Tank | Total Vol. | | Vol. Per tank | Total Vol. | | Vol. Per Tank | Total Vol. |
| 3 | 400 | 1200 | 5 | 400 | 2000 | 2 | 400 | 800 |

Total tank capacity will be 4,000 barrels. Tanks will be installed within secondary containment with a 150% capacity at the Currier BCU 0993-16-07. The containment will consist of a spray-in liner, which is more durable and has a longer lifespan than poly-liner. The spray-in liner will minimize potential spill incidents and impacts.

In order to reduce vehicular traffic during completions and flowback, Laramie will utilize temporary surface water lines to transfer recycled produced water. Up to two parallel 8-inch to 12-inch HDPE produced water pipes will be used to deliver water to completions operations at the well pad. These lines will be laid on an existing pipeline corridor (previously disturbed surface) to the extent possible and be approximately 5800 feet in length each. No surface disturbance will result from the placement of the temporary surface water lines. These lines will be removed following completions and flowback operations. Laramie anticipates approximately 81 days for completions and flowback activities.

**MITIGATION EFFORTS**

Placement of stormwater control features for the Currier BCU 0993-16-07 were designed by personnel certified in stormwater and Professional Engineer. Installation, maintenance, and inspection of stormwater control features will minimize the potential for erosion, sedimentation or the discharge or pollutants. Storm water will be concentrated to WPS perimeters where water will be directed alongside pad berm openings that lead off the pad to sediment traps. Rock armored channels from the openings within the sediment traps will direct flow to designated construction ditches that have rock checks to dissipate flow and eliminate erosion. Laramie's stormwater management efforts may include additional engineering measures such as the installation of culverts and/or flexpipe to divert water flow away from surface locations as needed. Flexpipe will be utilized in certain areas to carry flow over disturbed soils to where they will tie into said construction ditches with riprap to eradicate erosion and/or channeling.

During pre-production activities, stormwater and erosion control features will include v-ditch and berm along the perimeter of the WPS, sediment traps, and armored outlets.

After interim reclamation activities, Laramie will construct a v-ditch and earthen berm along the Production Pad Surface perimeter. Sediment traps will be strategically located and installed on the pad. During the initial production phase, regular visits will be conducted.

Laramie will install and maintain additional stormwater control measures off Location. During construction of the pad, Laramie will re-establish the borrow ditches along the existing private lease roads and install stormwater control measures to manage sediment transfer, slow water velocity, and dissipate the energy.

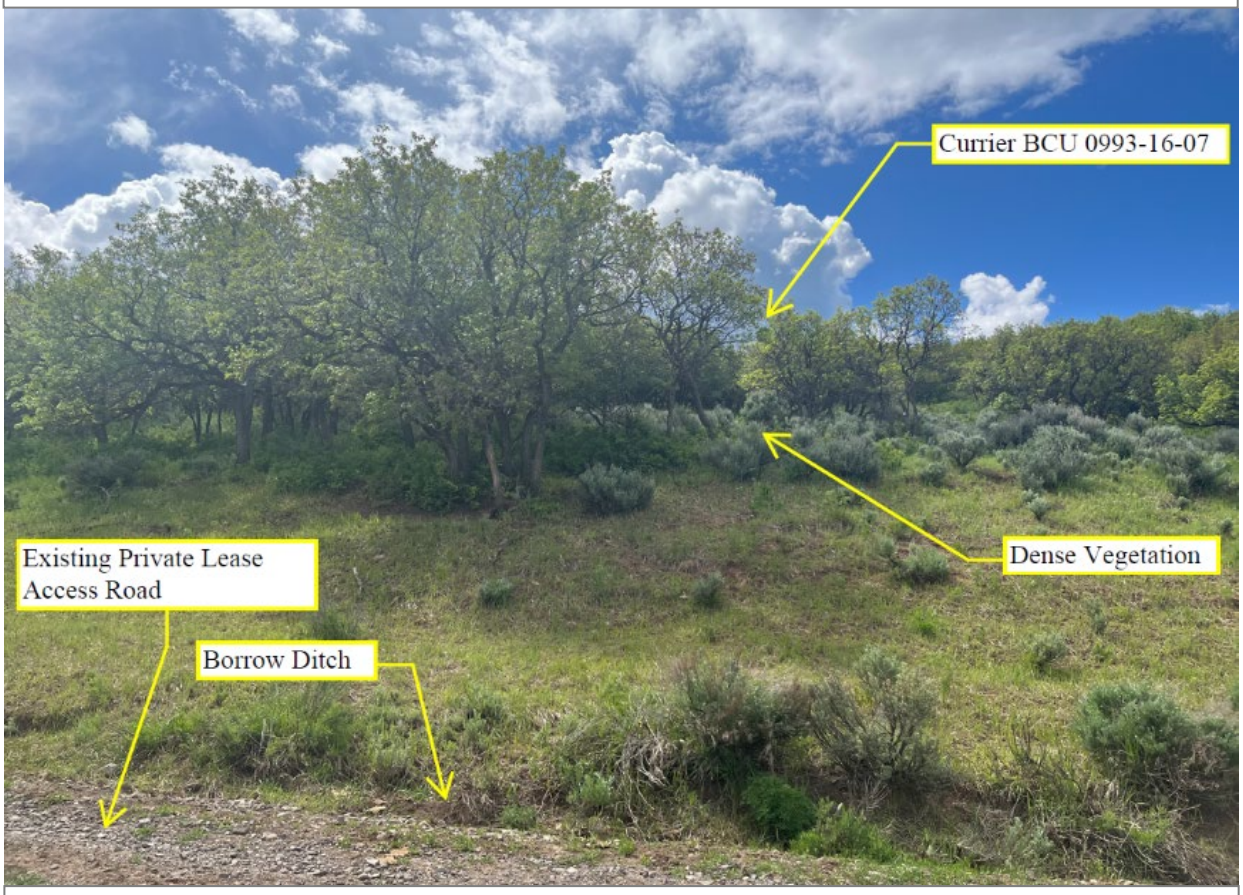
Vegetation communities within the proposed disturbance area and immediately surrounding the proposed well pad are comprised of mountain sagebrush shrublands and Gambel's oak shrublands with an understory of perennial forbs and grasses Existing vegetation surrounding the Location acts a barrier to further reduce sediment discharge or fluids from reaching the unnamed ephemeral and intermittent streams from the well pad.

In accordance with Commission Rule 427.c.(2), Laramie will only utilize fresh water to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body.

During drilling, completions, and flowback operations, a fully equipped emergency spill response trailer will be staged at Laramie's Buzzard Creek Laydown yard (permitted through Mesa County; owned and maintained by Laramie) and prepared for immediate response in the event of the release or spill during pre-production activities. A second emergency spill response trailer will be available for immediate mobilization if needed at Laramie's Harrison Creek Water Treatment Facility (Location ID # 413056) approximately 3.3 miles from the Currier BCU 0993-16-07 location.

An emergency spill kit (95-gallon drum spill kit) will be placed on the pad for any spills that might occur for the life of the producing wells.

**Photo 3. Facing South from Existing Private Lease Road toward the Currier BCU 0993-16-07**




Physical Barriers Between the Currier BCU 0993-16-07 and the drainages, including dense vegetation and existing lease road.

**BEST MANAGEMENT PRACTICES**

Laramie will employ the following Best Management Practices at the Currier BCU 0993-16-07 listed in **Table 2**.

| TABLE 2. BEST MANAGEMENT PRACTICES |
|---|
| During drilling, completions, and flowback operations, a fully equipped emergency spill response trailer will be staged at Laramie's Buzzard Creek Laydown yard (permitted through Mesa County; owned and maintained by Laramie) and prepared for immediate response in the event of the release or spill during pre-production activities. A second emergency spill response trailer will be available for immediate mobilization if needed at Laramie's Harrison Creek Water Treatment Facility (Location ID # 413056) approximately 3.3 miles from the Currier BCU 0993-16-07 location. |
| An emergency spill kit (95-gallon drum spill kit) will be placed on the pad for any spills that might occur for the life of the producing wells. |
| In accordance with Commission Rule 427.c.(2), Laramie will only utilize fresh water to conduct dust suppression activities within 300 feet of the ordinary high-water mark of any water body. |
| Production tanks will be utilized for the Currier BCU 0993-16-07. All tanks will be installed in secondary containment with at least 150% capacity. The secondary containment will be constructed of metal wall and spray-in liner. Spray-in liners are more durable and have a longer lifespan than HDPE liners. The spray-in liner will minimize potential spill incidents and impacts. |

| |
|---|
| During drilling, completions, and flowback phases, the Currier BCU 0993-16-07 will have personnel onsite full time and the pad will be inspected daily. During production phases, the Currier BCU 0993-16-07 will be inspected at least two to three times per week. In addition, the site will be monitored via remote telemetry. During production, tanks will be equipped with dedicated continuous monitoring through a SCADA platform at the Cowboy for remote monitoring, alerting, and shut-in capabilities. Laramie's SCADA system, which provides real-time fluid level data, will allow for continuous monitoring of tank volumes. |
| During construction of the pad, Laramie will re-establish the borrow ditches along the existing private lease roads and install stormwater control measures to manage sediment transfer, slow water velocity, and dissipate the energy. |

**Request For Waiver**
Laramie is requesting the CPW's consideration of a waiver from CECMC Rule 1202.a.(3). *At new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland.*

Please feel free to contact me at 970-985-8240 with any questions CPW might have.

Thank you,

*Katy Middleton*

Katy Middleton
Regulatory Specialist
Laramie Energy, LLC
kmiddleton@laramie-energy.com

CC: Denver
ATT: Currier BCU 0993-16-07 Preliminary Layout Drawings with Stormwater BMPs
Currier BCU 0993-16-07 Wildlife Map
Currier BCU 0993-16-07 Hydrology Maps
Currier BCU 0993-16-07 HPH Assessment
Currier BCU 0993-16-07 Sensitive Areas Determination