

From: [Magee - DNR, Brian](#)
To: [Kyle Siesser](#)
Cc: [Peter Foote - DNR](#); [Rusty Kelly](#); [Emma Millar](#)
Subject: Re: Outpost 33-8 Pad - Waiver Request
Date: Monday, December 2, 2024 3:27:42 PM

Great thanks Kyle-

CPW grants the waiver request to ECMC Rule 1202 (a) (3) for Catamount's Outpost 33-8 pad and OGDG with the implementation of the revised bmps.

This email chain should suffice as documentation of CPW's evaluation for Catamount's waiver request. You may want to reflect the revised bmps language in some of the materials that you'll need to submit for Permitting.

Please let me know if you have any questions or if ECMC staff needs anything else from CPW on this.

Thanks,

Brian

On Mon, Dec 2, 2024 at 3:20 PM Kyle Siesser <ksiesser@cottonwoodconsulting.com> wrote:

Brian,

Thanks for evaluating this. Catamount can adopt those changes. Would you like me to resend the email with those text changes?

Kyle

From: Magee - DNR, Brian <brian.magee@state.co.us>
Sent: Monday, December 2, 2024 11:02 AM
To: Kyle Siesser <ksiesser@cottonwoodconsulting.com>
Cc: Peter Foote - DNR <peter.foote@state.co.us>; rkelly <rkelly@catamountep.com>; Emma Millar <emillar@cottonwoodconsulting.com>
Subject: Re: Outpost 33-8 Pad - Waiver Request

Kyle- CPW has evaluated the structural and operational bmps proposed by Catamount in the waiver request from ECMC Rule 1202 (a) (3). These BMPs are designed to minimize potential impacts to aquatic resources including surface waters and wetlands in proximity to the proposed Outpost 33-8 pad. We have proposed some language changes from "would" to will in blue below. Please let me know if Catamount can adopt these changes in the BMPs.

Thanks,

Brian

1. Only freshwater ~~would~~ will be stored on the tank pad, which is located upgradient of the Pine River Southwest irrigation ditch. No refueling or chemical storage ~~would~~ will occur on the tank pad. The well pad is located downgradient of the irrigation ditch, thereby minimizing the potential for a release to impact the ditch.
2. Catamount ~~would~~ will install earth berms on the downgradient perimeter of the well pad and the working surface of the pad ~~would~~ will be slightly sloped to the north, toward the cut slope. Stormwater ~~would~~ will be controlled via ditches at the base of the cut slope and top of fill slope and directed to a gated drainpipe, which allows Catamount to control the discharge of fluid from the well pad. In the event of a release, the released fluids could be controlled on the well pad by closing the drainpipe and fluids could be removed and properly disposed of without discharging fluids downgradient of the well pad. These control measures are shown on the attached stormwater map.
3. A stormwater management plan (SWMP) has been developed for the project to minimize the potential for discharge of pollutants from the site.
4. No crude oil or condensate will be stored on the pad. Any produced water tanks ~~would~~ will be constructed of steel and installed within lined steel or Polystar style containment berms or other devices.
5. All chemical tanks will utilize secondary containment.
6. The site ~~would~~ will be inspected on a daily basis during construction, drilling, and completion. During the production phase, the site ~~would~~ will also be inspected on a regular basis and monitored remotely on a daily basis using best available technologies.
7. Adequate spill response equipment ~~would~~ will be maintained on the well pad during drilling and completion activities.
8. Catamount ~~would~~ will conduct 24-hour spill monitoring and can conduct remote shut down via SCADA during all production operations.
9. No pits ~~would~~ will be constructed as part of the proposed project.
10. The location of the site was selected based on proximity to existing pipeline infrastructure and well pads, landowner preference, and the ability to develop leases using the minimal amount of ground disturbance possible. The location allows for co-location of wells on an existing well pad and utilization of existing pipeline infrastructure to avoid new ground disturbance associated with pipelines.

On Wed, Nov 20, 2024 at 1:21 PM Kyle Siesser <ksiesser@cottonwoodconsulting.com> wrote:

Brian and Peter,

Catamount Energy Partners (Catamount) is proposing the expansion of an existing well pad and construction of a temporary tank pad on private lands in La Plata County. The project is known as the Outpost 33-8 Pad. The well pad would be used to drill 10 horizontal wells into the Mancos Shale. The tank pad would be used to store freshwater for completion purposes and the tank pad would be fully reclaimed following completion. Catamount is in the process of completing an ECMC Form 2A for an Oil and Gas Location Assessment. As part of the permitting process Catamount is requesting a waiver from ECMC Rule 1202 (a) (3), which states that *“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 proposed staging areas, refueling areas, and chemical storage associated with the project are within 500 ft of the following water features as shown on the attached map: 1) the Pine River Southwest Ditch (irrigation ditch located downgradient of tank pad and upgradient of well pad); 2) multiple irrigation-induced freshwater ponds located downgradient of well pad; 3) freshwater emergent wetlands associated with an intermittent stream located downgradient of the well pad; and 4) an unnamed irrigation ditch located downgradient of the well pad. Catamount is requesting a waiver from ECMC Rule 1202 (a) (3) based on the following reasons:

1. Only freshwater would be stored on the tank pad, which is located upgradient of the Pine River Southwest irrigation ditch. No refueling or chemical storage would occur on the tank pad. The well pad is located downgradient of the irrigation ditch, thereby minimizing the potential for a release to impact the ditch.
2. Catamount would install earth berms on the downgradient perimeter of the well pad and the working surface of the pad would be slightly sloped to the north, toward the cut slope. Stormwater would be controlled via ditches at the base of the cut slope and top of fill slope and directed to a gated drainpipe, which allows Catamount to control the discharge of fluid from the well pad. In the event of a release, the released fluids could be controlled on the well pad by closing the drainpipe and fluids could be removed and properly disposed of without discharging fluids downgradient of the well pad. These control measures are shown on the attached stormwater map.
3. A stormwater management plan (SWMP) has been developed for the project to minimize the potential for discharge of pollutants from the site.
4. No crude oil or condensate will be stored on the pad. Any produced water tanks would be constructed of steel and installed within lined steel or Polystar style containment berms or other devices.
5. All chemical tanks will utilize secondary containment.

6. The site would be inspected on a daily basis during construction, drilling, and completion. During the production phase, the site would also be inspected on a regular basis and monitored remotely on a daily basis using best available technologies.
7. Adequate spill response equipment would be maintained on the well pad during drilling and completion activities.
8. Catamount would conduct 24-hour spill monitoring and can conduct remote shut down via SCADA during all production operations.
9. No pits would be constructed as part of the proposed project.
10. The location of the site was selected based on proximity to existing pipeline infrastructure and well pads, landowner preference, and the ability to develop leases using the minimal amount of ground disturbance possible. The location allows for co-location of wells on an existing well pad and utilization of existing pipeline infrastructure to avoid new ground disturbance associated with pipelines.

Please find attached a hydrology map showing water features within 500 ft of the well pad and tank pad, a stormwater map depicting stormwater control measures, and facility layout diagrams showing the pad layout during drilling, completion, and flowback. Please let us know if you have any questions regarding this waiver request. Thanks.

KYLE SIESSER, P.G.



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