



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

SEP 28 1994

Ref: 8WM-DW

Mr. Ed DiMatteo  
Senior Engineer  
Colorado Oil and Gas  
Conservation Commission  
1580 Logan Street, Suite 380  
Denver, Colorado 80203



RECEIVED

SEP 29 1994

COLORADO OIL & GAS CONS. COMM.

RE: Aquifer Exemption Request for the  
Dakota Formation in the Canadian  
River Field

Dear Ed:

I have reviewed the application by Gasco, Inc., for an exemption of the Dakota Formation in the Canadian River Field. The proposed injection well (Blevins A-1) is located in Section 3, T9N, R78W and will inject produced water from the Dakota and Muddy Formations at a depth of 1,700 feet.

My review raised several questions which need to be addressed prior to making a recommendation to Max Dodson regarding concurrence. My comments are as follows:

1. A brief description of the operation associated with the proposed disposal well is needed. For instance, what is the source of produced water and what are the present producing zones? Which wells are involved in the production of oil or gas and water. Where is the water presently being taken for disposal and why is this well needed immediately?
2. The application indicated that the Dakota was oil producing but does not indicate whether the Dakota is still oil producing. The location of the historical producing zones in the field relative to the disposal zone in the Blevins A-2 should be described. Well completion diagrams for the producing wells should be included.
3. Although there are no water wells in the immediate sections adjacent to the project, the exemption process would be enhanced if the area of review for water wells was expanded. I would suggest that a 6 to 10 mile radius be used. This will assist in identifying potential Pierre shale sand stringers which may be local water sources.
4. Information on how the wells were sampled should be provided.



5. The Dakota sample analysis seems to be in error. I question bicarbonate analysis for the State #1 Dakota sample.

Because of the shallowness of this injection horizon, it is important that EPA have input from the Colorado Department of Public Health and the Environment regarding their concerns prior to making any final decision. Comments received from the general public should also be sent to me as soon as they are received. All comments will be considered as part of our review process.

If you have any questions, please give me a call.

Sincerely,



Paul S. Osborne  
Regional Ground Water Expert

cc: George Moravec, CDPH&E  
Brian Macke, COGCC