

STATE OF
COLORADO

Allison - DNR, Rick <rick.allison@state.co.us>

COGCC request to sample Wellington Operating Rapid Infiltration Basin - Larimer County

Cameron <graceyservices@msn.com>

Tue, May 9, 2017 at 5:06 PM

To: "Allison - DNR, Rick" <rick.allison@state.co.us>

Cc: Cameron <graceyservices@msn.com>, Larry Wagner <larrywagner100@gmail.com>, BRADLEY POMEROY <Pomoco@msn.com>

Rick,

We use Baker Hughes RBW 508 as a reverse breaker ahead of the FWKO at both batteries of the Wellington Field, injecting on a continual basis. Wells are treated once a month, using Baker Hughes XP-200, a scale/corrosion inhibitor treated down the annulus and flushed using prod. water mixed w/ Baker Hughes XC 302 biocide.

Let me know if you need anything else.

Thanks, Cam

From: Allison - DNR, Rick [rick.allison@state.co.us]

Sent: Tuesday, May 9, 2017 1:51 PM

To: BRADLEY POMEROY

Cc: Cam Gracey; Larry Wagner

Subject: Re: COGCC request to sample Wellington Operating Rapid Infiltration Basin - Larimer County

Thank you Brad. Can you or Cam provide specific names on the products used so that we have that information to aid in review of our analytical results?

Thanks again for your assistance with the project.

Rick

Richard Allison, P.G.

Environmental Protection Specialist, Northeast Colorado

[co_dnr_div_ogcc_300_rgb_ltrhd_v3]

P 970.461.2970 | C 970.623.0850

1120 Lincoln Street, Suite 801, Denver, CO 80203

rick.allison@state.co.us<<mailto:rick.allison@state.co.us>> | www.colorado.gov/cogcc<<http://www.colorado.gov/cogcc>>

On Mon, May 8, 2017 at 7:26 PM, BRADLEY POMEROY <POMOCO@msn.com<<mailto:POMOCO@msn.com>>> wrote:

We use a Baker product monthly to lubricate the rod string in our predominantly water pumping environment called Xtend. Also a small amount of demulsifier to assist oil water breakout.

Sent from my Verizon 4G LTE Droid

On May 8, 2017 3:15 PM, "Allison - DNR, Rick" <rick.allison@state.co.us<<mailto:rick.allison@state.co.us>>> wrote:
Hi Cam,

I met with Larry today and collected the produced water sample from the Wellington Water Treatment Plant, but have a few questions for you. What treatments are added at the wellhead or in the production stream to control for scale, paraffin or emulsions, if any?

Thank you
Rick

Richard Allison, P.G.

Environmental Protection Specialist, Northeast Colorado

[co_dnr_div_ogcc_300_rgb_ltrhd_v3]

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On Tue, Apr 18, 2017 at 8:09 AM, Allison - DNR, Rick <rick.allison@state.co.us<mailto:rick.allison@state.co.us>> wrote:
Great, thank you Larry. I will check in with you in early May.
Rick

Richard Allison, P.G.
Environmental Protection Specialist, Northeast Colorado

[co_dnr_div_ogcc_300_rgb_ltrhd_v3]

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On Tue, Apr 18, 2017 at 8:01 AM, Larry Wagner <larrywagner100@gmail.com<mailto:larrywagner100@gmail.com>> wrote:
Rick.
I will put it in my calendar. Looking forward to meeting you then.

Larry

Sent from my iPhone

On Apr 18, 2017, at 7:55 AM, Allison - DNR, Rick <rick.allison@state.co.us<mailto:rick.allison@state.co.us>> wrote:

Thank you Larry.

Can we tentatively plan for May 8?

Rick

Richard Allison, P.G.
Environmental Protection Specialist, Northeast Colorado

<image003.jpg>

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On Tue, Apr 18, 2017 at 7:21 AM, Larry Wagner <larrywagner100@gmail.com<mailto:larrywagner100@gmail.com>> wrote:
Rick,

I can be around anytime that you would like to collect a sample. Just let me know and I will make it work.

Thanks
Larry Wagner
970-219-6793<tel:(970)%20219-6793>

Sent from my iPhone

On Apr 17, 2017, at 1:59 PM, Allison - DNR, Rick <rick.allison@state.co.us<mailto:rick.allison@state.co.us>> wrote:

Hi Parker, Cam or Larry,

COGCC would like to coordinate sampling the pre-treatment produced water at the discharge plant with one of you. Ideally we will collect our sample during the monthly the routine May discharge sampling event. However, COGCC

needs to sample as early in the week as possible due to constraints at the laboratory for some of our analyses.

Please let me know when might be a convenient time for us to meet you and conduct this sampling.

Thank you,
Rick

Richard Allison, P.G.
Environmental Protection Specialist, Northeast Colorado

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----- Forwarded message -----

From: BRADLEY POMEROY <POMOCO@msn.com<mailto:POMOCO@msn.com>>

Date: Tue, Apr 11, 2017 at 10:23 AM

Subject: Re: COGCC request to sample Wellington Operating Rapid Infiltration Basin - Larimer County

To: "rick.allison@state.co.us<mailto:rick.allison@state.co.us>" <rick.allison@state.co.us<mailto:rick.allison@state.co.us>>

Cc: "Robert.Chesson@state.co.us<mailto:Robert.Chesson@state.co.us>" <Robert.Chesson@state.co.us<mailto:Robert.Chesson@state.co.us>>, "peter.gintautas@state.co.us<mailto:peter.gintautas@state.co.us>" <peter.gintautas@state.co.us<mailto:peter.gintautas@state.co.us>>, "pcoit@telesto-inc.com<mailto:pcoit@telesto-inc.com>" <pcoit@telesto-inc.com<mailto:pcoit@telesto-inc.com>>, "Stephen.Rogers@arcadis.com<mailto:Stephen.Rogers@arcadis.com>" <Stephen.Rogers@arcadis.com<mailto:Stephen.Rogers@arcadis.com>>, "graceyservices@msn.com<mailto:graceyservices@msn.com>" <graceyservices@msn.com<mailto:graceyservices@msn.com>>, "rseaworth@msn.com<mailto:rseaworth@msn.com>" <rseaworth@msn.com<mailto:rseaworth@msn.com>>, "larrywagner100@gmail.com<mailto:larrywagner100@gmail.com>" <larrywagner100@gmail.com<mailto:larrywagner100@gmail.com>>, "diana.burn@state.co.us<mailto:diana.burn@state.co.us>" <diana.burn@state.co.us<mailto:diana.burn@state.co.us>>

Mr. Allison,

Wellington Operating Company is ready and willing to assist the commission in conducting its sampling program. It appears that the address lines have all the players noticed. Please feel free to contact Cameron (field super) or Parker (Telesto's rep) or Larry (plant ops) to schedule a discharge sampling. Let us know ahead of time when the sampling will occur and, I would prefer that one of our representatives be present when the samples are taken.

Regards,

Bradley Pomeroy
President, Wellington Operating Company
303-220-5399<tel:(303)%20220-5399>
pomoco@msn.com<mailto:pomoco@msn.com>

----- Original Message -----

From: Allison - DNR, Rick<mailto:rick.allison@state.co.us>

To: BRADLEY POMEROY<mailto:pomoco@msn.com>

Cc: Chesson, Robert<mailto:Robert.Chesson@state.co.us> ; Peter Gintautas - DNR<mailto:peter.gintautas@state.co.us> ; Parker Coit<mailto:pcoit@telesto-inc.com> ; Rogers, Stephen E.<mailto:Stephen.Rogers@arcadis.com>

Sent: Tuesday, April 11, 2017 10:00 AM

Subject: COGCC request to sample Wellington Operating Rapid Infiltration Basin - Larimer County

Hello Brad,

The COGCC staff are conducting a state-wide produced water study in 2017, which will include study of produced waters from the northern DJ Basin. In 2011 the State Review of Oil & Natural Gas Environmental Regulations (STRONGER) review of COGCC rules, policies and practices review noted that the COGCC did not have appreciable data concerning concentrations or activities of radioactive constituents in E&P waste streams in Colorado (http://cogcc.state.co.us/documents/library/Technical/Independent_Evaluation_of_COGCC_Regulations_and_Processes/2011_Stronger_Review.pdf).

The relative lack of natural occurring radioactive materials (NORM) data in COGCC records is in part because the

COGCC has no statutory granted authority over use or disposal of radioactive materials. Regulatory authority over radioactive materials by statute is with the Colorado Department of Public Health and Environment (CDPHE) in all processes and wastes even though COGCC does in general regulate all other aspects of storage and disposal of E&P wastes along with requiring remediation of spills or releases of E&P wastes when necessary to ensure compliance thresholds established by rule.

This study is not regulatory in nature but is to gain a better understanding of possible NORM that may occur in produced waters and flowback fluids. It is a continuation of the 2014 soils NORM study which evaluated the land application of drill cuttings on agricultural land in the GWA area (http://cogcc.state.co.us/documents/library/AreaReports/DenverBasin/NORM_REPORT_%20Final_11252014_combined.pdf). One of the recommendations from the 2014 report was a follow-on study to evaluate NORM in produced waters.

The COGCC staff wish to work cooperatively with operators in the planning and sampling of a small subset of wells in the DJ Basin and COGCC would like to enlist your cooperation in obtaining a sample of the water discharged into the infiltration pits in the Wellington field. This location was chosen based on its water production from the Muddy J Sand and the fact that there is a permitted discharge for this facility. Our time frame is to complete the sample collection before the end of our fiscal year (June 30, 2017).

I have attached a draft of Table 1 from our SAP showing the analytes, matrices, methods and projected number of samples we are intending to sample and obtain analytical laboratory results. We would like to collect a pre-treatment sample of the produced water, and propose we would collect this sample in coordination with your contractors during their monthly discharge sampling event in either May or June.

As always, we would be glad to discuss further with you this project and our expected final report.

Best Regards,
Rick

Richard Allison, P.G.
Environmental Protection Specialist, Northeast Colorado

<image003.jpg>

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