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Tammy Fredrickson
Senior Permit Agent

May 3, 2018

Alex Fischer
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Ste 801
Denver, CO 80203

Re: Controls to Prevent Migration of E&P Waste on and off Location via Misting

Dear Mr. Fischer:

During an onsite visit at Our Wyoming Canyon Creek Evaporation Facility, it was observed that existing safe guards in place would not meet the requirements of the Colorado Oil & Gas Conservation Commission. Wexpro Company has thoroughly evaluated the Wyoming controls and has made modifications to account for the difference in rules between states in regards to the Powder Wash Evaporation Facility.

Wyoming Facility	Proposed Colorado Facility	Difference
445'x480' pond with 1,000-1,200 bbls per day intake. Runs at maximum rate and top speed.	300'x300' pond with 500 bbls per day intake. Controls will be set at 3-5 mph wind speed.	Smaller pond size and daily water volume intake allows for controls to be set at 3-5 mph weed speed. The Wyoming pond has a larger intake volume and runs every day, all day unless wind is over 15 mph.
Floating Evaporators in center of pond.	Side Mounted Evaporators	Evaporators will be placed on the upwind side of the pond.
Landshark Wastewater Evaporator – Fan Airflow in excess of 100 mph, flow rate up to 110 gpm. Water pressure: 100 psi. 30 inch fan width.	Barracuda Evaporators – Fan airflow is 78 mph, flow rate up to 87 gpm. Water pressure 80-100 psi. 24 inch fan width.	Landshark evaporators are used where overspray is less of a concern and in larger evaporation ponds. Barracuda evaporators are a smaller version of the original Landshark.

Wexpro Company has chosen to use Barracuda Wastewater Evaporators where the water is forced through a stainless steel manifold with 30 spray nozzles specifically designed to allow for longer float times maximizing evaporation. The evaporators will be electronically controlled to operate only during specific weather conditions related to humidity, wind speed and temperature with intent of minimizing the potential and/or eliminating overspray. In addition, the Barracuda Evaporators will be placed on the upwind side of the pond and not placed in the pond.

Wexpro Company intends to use engineered controls to keep from allowing any misting from blowing outside of the lined pit itself, as any misting outside of the lined pit (including the 30' fire lane) will be considered a Spill/Release by the Colorado Oil and Gas Conservation Commission.

Wexpro Company will also utilize SMI Smart H2O Software which will automatically shut down and start up the evaporator and pump based on different weather conditions. Accurate weather measurement includes sensors, and solar power to protect against disruption of the power supply. Control limits will be set at maximum 3 to 5 mph. rate in order to avoid overspray. When levels reach a certain criteria the evaporators will automatically shut off. Wexpro Company field operations will also conduct daily visual inspections of the evaporation pond, and the computer system checking for any alarms or malfunctions.

Wexpro Company feels these measures will adequately provide safe guards against the potential of having a spill or release. Wexpro Company will follow Colorado Oil and Gas Conservation Commissions Rule 906 in regards to spills and releases.

Please let us know if you have additional questions or concerns.

Sincerely,

Tammy Fredrickson

Tammy Fredrickson
Senior Permit Agent