

STATE OF
COLORADODOC 1313086
Operator Response to Sundry Tenorm doc
403025829

Neidel - DNR, Kris <kris.neidel@state.co.us>

TENORM Sampling Plan COAs review Doc#4030258293 messages

Stauthamer, Michael <Michael.Stauthamer@stantec.com>

Mon, May 9, 2022 at 5:11 PM

To: "Neidel - DNR, Kris" <kris.neidel@state.co.us>, "alex.fischer@state.co.us" <alex.fischer@state.co.us>

Cc: Spencer Jackson <Spencer.Jackson@scoutep.com>

Hi Kris and Alex,

For ease of reference I attached Form 4 Sundry Notice Doc#403025829. The following are responses to the COAs provided by the COGCC. If necessary we can set up a call to discuss as needed or feel free to email any additional questions you may have. Thank you

COA #1 - COGCC does NOT object to the proposed bulk treater collection point for TENORM. The results should be compared to determine the soundness of this method.

Response #1 – Scout acknowledges this COA and believes Section 10 (Data Analysis) of the Sampling Plan meets the requirement of this COA.

COA #2 – Approval of this sundry, relevant to 909.j is for the comingled sample collection at the bulk treater, specific test methods that vary from, "standard environmental procedures", are not under this review.

Response #2 – Scout acknowledges this COA and believes that the Sampling Plan complies with COGCC Rule 909.j(4) stating "Operators will collect samples according to standard environmental procedures."

COA #3 – Results of sampling shall be submitted on a Form 43.

Response #3 - Scout acknowledges this COA and analytical results will be submitted on a COGCC Form 43.

COA #4 – If solids (sludge) is being sampled why not sample the water plant(s) sludge that is being placed in the pits?

Response #4 – Scout acknowledges this COA. The COGCC only requires sampling and characterization of the produced water entering pits (unlined) and does not require sampling of solids/sludge from the pits. Produced water entering the pits is representative of the contents of the pit. Solids sampling for CDPHE Part 20 are addressed in the Sampling Plan:

Section 6.1.2 (Solid Waste) During routine maintenance, solids accumulate in several facilities and periodically must be removed for disposal. These facilities include:

- Collection Station Separators
- Pits (Collection Station and Water Plants Pits)
- Blowdown Tanks
- Pipe scale
- Backflow injection well solids
- Tank bottoms for both Water Plants
- E&P spills and releases with potential NORM constituents

- Solids from clarifiers
- Solids from filter backwashes
- Solids from water filters and screens

Many of these facilities rarely require maintenance and, in some cases, only require sediment removal every 10 years. Some of these facilities rarely have enough sediment for sampling or are difficult to collect samples without disrupting operations. As described in the following sections, samples collected at the collection station separators and truck unloading tank are proposed to be representative of any accumulated solids from the downstream processes. Other potential solids will be evaluated for TENORM concentrations at specific locations as detailed in this plan.

Section 6.1.6 (Pits and Holding Tank Solids and Sludge) Sample collection for TENORM determination of sediments and sludge from the pits and tanks will not be necessary. Analysis of all produced water entering the Collection Stations and representative solids/sludge samples from the Collection Station's primary separators will provide sufficient data to make a multi-location characterization for TENORM determination and applicability with Part 20 requirements for all pits and tanks.

COA #5 – *All samples should be analyzed for constituents found in 909.j*

Response #5 - Scout acknowledges this COA and believes that the Sampling Plan Section 7.6.2 (Annual Produced Liquids/Produced Water) and Section 7.7 (Annual Chemical Sampling Analysis, Methods, and Detection Limits) includes all constituents listed in COGCC Rule 909.j.

COA #6 – *For main and west water plant pit, it is stated, "Sludges from clarifiers and filter backwashing are also sent to the Pits." This pits are permitted as Emergency Pits and not for storage or disposal of E&P waste.*

Response #6 - Scout acknowledges this COA. The Sampling Plan Section 3 states "...Pits for the Main and West Water Plants: If a failure occurs at the water plants, water flows into the Pits. Sludges from clarifiers and filter backwashing are also sent to the Pits during an Emergency/Upset Condition only. Water is pumped out of the pits and back through the water treatment plants, and the sludges remain in the pits.)

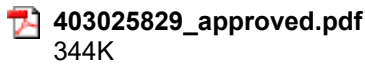
Mike Stauthamer MEM, PMP

Project Scientist/Manager

Mobile: 307 231-7660



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Stauthamer, Michael <Michael.Stauthamer@stantec.com>

Thu, May 19, 2022 at 9:16 AM

To: "Neidel - DNR, Kris" <kris.neidel@state.co.us>, "alex.fischer@state.co.us" <alex.fischer@state.co.us>

Cc: Spencer Jackson <Spencer.Jackson@scoutep.com>

Good Morning Kris and Alex,

Hope you guys are ready for some winter weather tomorrow! When can we expect to hear back on the responses to COAs? Scout Energy Management would like to begin implementing the Sampling Plan as soon as possible to submit an initial water quality analysis to the COGCC no later than July 15, 2022.

Thanks!

Mike Stauthamer MEM, PMP

Project Scientist/Manager

Mobile: 307 231-7660



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Neidel - DNR, Kris <kris.neidel@state.co.us>

Thu, May 19, 2022 at 11:12 AM

Draft To: "Stauthamer, Michael" <Michael.Stauthamer@stantec.com>

Cc: "alex.fischer@state.co.us" <alex.fischer@state.co.us>, Spencer Jackson <Spencer.Jackson@scoutep.com>

Michael,

What I was referring to in "COA#6" is this statement in 3.0

"Pits for the Main and West Water Plants: If a failure occurs at the water plants, water flows into the Pits. Sludges from clarifiers and filter backwashing are also sent to the Pits. Water is pumped out of the pits and back through the water treatment plants, and the sludges remain in the pits."

It was stated that
Kris Neidel
Environmental Protection Specialist Northwest Area

Colorado Oil and Gas Conservation Commission
Phone 970-846-5097



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