



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466



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Ref: 8WM-DW

JUN 03 1992

Mr. Dennis R. Bicknell, Director
Colorado Oil and Gas Conservation Commission
1580 Logan Street, Suite 380
Denver, Colorado 80203

RE: Emerald Unit, "J" Sand
Aquifer Exemption Request

Dear Mr. Bicknell:

My staff has reviewed the application from Walsh Production for an aquifer exemption for the "J" Sand in the Emerald Unit. The Emerald Unit is located in Logan County in Sections 26, 34, and 36 of T9N, R54W. The applicant proposes to inject into the "J" Sand reservoir for the purpose of enhanced recovery. The "J" Sand is an oil producing reservoir containing water with a total dissolved solids (TDS) content of approximately 6,400 mg/l. The initial water flood will commence utilizing the Emerald Unit 4-35 well.

Our review indicates that the formation to be exempted does not presently serve as an underground source of drinking water and will not serve as a source of drinking water because the reservoir is a commercial hydrocarbon producing zone. Because the project is for the purpose of enhanced recovery, EPA has no objection to the granting of the exemption.

Thank you for the opportunity to comment.

Sincerely,

Max H. Dodson, Director
Water Management Division