



COLORADO

**Department of Public
Health & Environment**

January 25, 2023

Julie Murphy, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

**Re: Colorado Department of Public Health and Environment’s Rule 309.f Consultation
Comments for the Laramie Energy LLC Hayward 0993-25-09 Pad 455725 Oil and Gas
Development Plan (Docket Number 402975999)**

The Colorado Department of Public Health and Environment (CDPHE) appreciates the opportunity to consult on the Laramie Energy LLC Hayward 0993-25-09 Pad 455725 (Hayward) Oil and Gas Development Plan (OGDP), as well as the ongoing collaboration with the Colorado Oil and Gas Conservation Commission (COGCC) to fulfill our shared mission to protect public health and the environment. CDPHE’s Rule 309.f consultation timeline for this OGDP is as follows: Laramie Energy LLC and CDPHE had an initial discussion about the Hayward OGDP on December 13th, 2022. Laramie Energy LLC provided its completed CDPHE BMP spreadsheet to CDPHE on December 16, 2022. A consultation meeting including CDPHE, COGCC, and Laramie Energy LLC was held on January 24, 2023.

The proposed OGDP is located on rural privately owned lands in Mesa County, which is currently in attainment of all National Ambient Air Quality Standards (NAAQS). The proposed OGDP is located within 2,000 feet of one residential building unit (RBU), which is used part-time, as a second home by the owner. The RBU is located upwind of the pad, with varying topography and thick forest and vegetation providing a natural buffer. The RBU and the proposed location is located within a Disproportionately Impacted Community (DIC), as defined by COGCC. The proposed OGDP is located 3.6 access miles from the nearest public road.

Considering the relatively isolated location of the proposed OGDP and limited use of the RBU located within 2,000 feet of the location, CDPHE appreciates Laramie Energy LLC’s commitment to implement a number of Best Management Practices (BMPs) in order to prevent and mitigate impacts to public health and the environment. For example, any BMPs designed to minimize emissions will help reduce cumulative emissions in the region. Use of recycled



water helps conserve water resources while significantly reducing the number of truck trips associated with the operation. To protect public health and air and water resources, CDPHE supports incorporation of each of the BMPs that Laramie Energy LLC has committed to in the Hayward OGD, as noted in the linked BMP spreadsheet and listed below.¹

Air BMPs

- Operator will implement ambient air quality monitoring on site.
- Operator will properly maintain vehicles and equipment.
- Operator will use non-emitting pneumatic controllers.
- Venting/Flaring: Operator will not flare or vent gas during completion or flowback, except in upset or emergency conditions, or with prior written approval from the Director for necessary maintenance operations.
- Venting/Flaring: Operator will control emergency flaring with an enclosed combustor with a destruction efficiency of 98% or better and an actual destruction efficiency of 95% or better.
- Venting/Flaring: Operator will control bradenhead/casinghead venting.
- Pipelines: Operator will use pipelines to transport water for hydraulic fracturing to location.
- Pipelines: Operator will shut in the facility to reduce the need for flaring if the pipeline is unavailable
- Odor mitigation: operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore
- Odor mitigation: Operator will ensure that all drilling fluid is removed from pipes before storage

Water BMPs

- Stormwater inspections: Operator will conduct stormwater inspections immediately after storm event.
- Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations.
- Operator will recycle or beneficially reuse flowback and produced water for use downhole (Laramie Energy LLC uses recycled produced and flowback water during completion operations. Approximately 95% of water used for pre-production activities will be recycled water amended with freshwater when necessary.).
- Vehicle fueling: Operator will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections.
- Dust suppression: Operator will not use produced water or other process fluids for dust suppression.

¹ Laramie Energy LLC Response to CDPHE BMP List, https://drive.google.com/file/d/16U1KqFWSjYwD9OJ3jykOqJPpAQz1oeF/view?usp=share_link



- COGCC permit will incorporate other agency water quality protection plans by reference as applicable (e.g. stormwater management plan).
- Down gradient controls: Operator will install adequate down gradient controls if they can not have a control at the source.
- Outfall locations: Outlet protection should be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow. Outlet protection should be provided where the velocity at the culvert outlet exceeds the maximum permissible velocity of the material in the receiving channel.
- Stream crossing and Road Construction: Operator will ensure that control measures are designed, installed and adequately sized in accordance with good engineering, hydrologic and pollution control practices.
- Documentation / stormwater management plan: If it is infeasible to install or repair a control measure immediately after discovering a deficiency, operator will document and keep on record in the stormwater management plan: (a) a description of why it is infeasible to initiate the installation or repair immediately; and (b) a schedule for installing or repairing the control measure and returning it to an effective operating condition as soon as possible.

Waste BMPs

- Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream).
- Operator will properly test for and dispose of TENORM if CDPHE's 6 CCR 1007-1 Part 20 (TENORM) regulations apply to operations at this location.

PFA's BMPs

- Operator will not use fracturing fluids which contain PFAS compounds

CDPHE appreciates this opportunity to consult and looks forward to continued collaboration with COGCC. CDPHE also appreciates Laramie Energy LLC's engagement during this process and we have no additional recommendations at this time. Please do not hesitate to contact me if you have any questions.

Sincerely,



Rick Coffin
Energy Liaison
Colorado Department of Public Health & Environment

