



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2405

Ref: 8WM-DW

APR 5 1990



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APR 06 1990

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

COLO. OIL & GAS CONS. COMM.

RE: Aquifer Exemption Request  
for "J" Sand Formation for  
the State A-1 well in the  
Atwood Field, Logan County,  
Colorado

Dear Mr. Bicknell:

As requested, my staff has reviewed the information submitted regarding the requested aquifer exemption for the State A-2 well in Section 29, T7N, R53W in the Atwood Field. This request is a resubmittal of the withdrawn State A-1 disposal permit/aquifer exemption request. The "J" Sand aquifer is located at a depth of about 4000 feet and has a TDS of about 4500 mg/liter.

EPA's review of the data indicates that the aquifer is:  
1) not presently a source of drinking water; 2) contains greater than 3000 mg/liter TDS; and 3) not reasonably expected to supply a public water system because of location, water quality, and alternative sources of supply. Based on the findings above, EPA has no objections to the proposed exemption.

It should be noted that the water quality analysis report submitted with the request indicated that the laboratory makes no guarantees as to the accuracy of their test results. Additionally, the operator has not provided any details on how the sample was taken. The lack of information relating to the quality assurance involved in taking and analyzing the sample continues to be a matter of concern. It places emphasis on your present effort to develop a quality assurance plan which will inform operators and laboratories of the need for better documentation of how samples are taken and analyzed. We look forward to helping the COGCC complete this process.

If there are any questions regarding our review, please call Paul Osborne at 293-1418.

Sincerely,

Max H. Dodson  
Director  
Water Management Division