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SLIDES: BMP Project

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BMP Project

Kent Kuster
CDPHE Consultation Coordinator

CDPHE Regulatory Role

- Stormwater Construction Permits
 - <http://www.cdphe.state.co.us/wq/PermitsUnit/stormwater/index.html>
- Air Pollution Control Permits
 - APEN – air pollution emission notices
 - Air Permits
 - General Permit or Individual Permit
 - <http://www.cdphe.state.co.us/ap/oilgasCOGCC.html>
- Water Quality Control Division Permits
 - Industrial Permit for Produced Water
 - General Permit or Individual Permit
 - <http://www.cdphe.state.co.us/wq/PermitsUnit/Industrial/index.html>

CDPHE Regulatory Role

- CDPHE Hazardous Materials and Waste Management Division
 - Commercial Solid Waste Facilities
 - Hazardous Waste Facilities
- <http://www.cdphe.state.co.us/hm/index.htm>

CDPHE Consultative Role

- HB-1341
 - Operator requested variance of COGCC Rules:
 - 317B Public Water System Protection
 - 325 Underground Disposal of Water
 - 603 Drilling & Well Servicing Operations and High Density Area Rules
 - 608 Coalbed Methane Wells
 - 805 Odors and Dust
 - 900-series E&P Waste Management
 - 1002(f) Stormwater Management

CDPHE Consultative Role

- Local Government Designee consultation request
- Increase in Well density to more than 1 well per 40 acres
- Commission developed basin wide order that may impact public health, welfare, safety and the environment
- Comprehensive Drilling Plans

PRESENTATION

- How does the industry benefit from using BMPs
- Examples of Air, Stormwater, Solid Waste, and Water Quality Protection BMPs
- What is the role of BMPs when consulting with CDPHE on a variance request

Benefits to Industry

- BMPs may provide the operator with options when consulting with CDPHE
- Reduced administrative/regulatory obligations
- Reduced enforcement exposure
- Increased public acceptance of operations
- Potential to increase revenue
- Potential to reduce Green House Emissions

Air Quality BMPs

- Directed Inspection and Maintenance
- Active management of water storage facilities
- Measures to minimize venting/emissions
- Central collection facilities
- Natural gas fired drill rig engines
- Directional drilling activities

Air Quality BMPs

- Green completions
- Road maintenance and/or surfacing
- Remote well automation



Solid Waste BMPs

- Minimize waste on well sites
- Store materials properly
- Reuse and recycle
- Use drip pans for leaks
- Ensure that rig wash is properly disposed of or treated
- Encourage innovation to minimize waste

Solid Waste BMPs

- Minimize hazardous materials by evaluating the use of non-toxic/less toxic substances
- Separate waste streams (exempt vs. non-exempt waste and solid waste vs. hazardous waste)
- Ensure that sewage is actually being disposed of at a authorized treatment facility



Stormwater Management & BMPs

- Overall goal is prevention
 - Evaluate the site and choose the most effective methods to control stormwater runoff
 - Locating the pad is a critical step in managing stormwater
 - Historical drainage patterns
 - Sizing of culverts
 - Implement stormwater management before, during and after site preparation e.g. berms, grading techniques and detention ponds

Stormwater Management & BMPs

- Simple BMPs are often the most effective
 - Grading Techniques
 - Surface roughing, slope tracking, and grading the well pad away from the cut slope
- Inspections are very important to ensure BMPs remain functional
- Please remember that stormwater must be controlled at all times
- The stormwater management plan is a living document that must be updated to reflect the current situation

Water Quality BMPs

- Slope the well pad away from water sources to minimize potential contamination from spills
- Construct detention ponds to capture spills from the well pad and keep emergency response equipment onsite to quickly clean up a spill
- Monitor fluids levels in the pits with particular attention to the liner seams for possible tears etc.
- Plan for the use, storage, and transfer of hazardous materials

Water Quality BMPs

- Minimize fluids and chemicals onsite by using centralized operations e.g. fracing or produced water management facilities
- Conduct weekly spill prevention meetings to ensure your staff can respond quickly and effectively
- Train your staff on the use of the Colorado Environmental Release and Incident Reporting Hotline 1-877-518-5608

BMPs and HB-1341 CDPHE Consultation

- CDPHE encourages operators to propose BMPs as part of their variance request that provide substantially equivalent protection for the given situation
- BMPs proposed for a variance request should be site specific addressing any special site conditions
- CDPHE anticipates maintaining a list of industry developed BMPs as we gain more experience with variance requests

Questions

