Originator CO2115

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
http://www.epa.gov/region08

U2 Entered
Date 4-24-03
Initial NW

Ref: 8ENF-T

MAR 21 2003

CERTIFIED MAIL 7002 0860 0005 3834 5995
RETURN RECEIPT REQUESTED

TAB	GREEN	BLUE	CBI
		1	

Mr. Kent L. Gilbert
Senior Vice President
K. P. Kauffman Company, Inc.
1675 Broadway, Suite 2800
Denver, Colorado 80202

Re: UNDERGROUND INJECTION CONTROL (UIC)
Permission To Resume Injection
Suckla Farms #1
EPA ID# CO10516-02115
Spindle Field
Weld County, Colorado

Dear Mr. Gilbert:

On March 17, 2003, EPA received information from K. P. Kauffman Company, Inc. on the above referenced well concerning the workover and the follow up mechanical integrity test (MIT) conducted on March 17, 2003. The data submitted shows that the well passed the required MIT. Therefore, pursuant to the above referenced UIC Permit and Title 40 of the Code of Federal Regulations (40 CFR) Section 144.51(q)(2), permission to resume injection is granted.

Under continuous service, the next MIT will be due on or before March 17, 2008. If the well is to be temporarily abandoned (TA'd), EPA should be notified. If the well is abandoned for more than two (2) years, it shall be plugged and abandoned in accordance with UIC regulations unless sufficient reasons are provided by Kauffman to extend the TA status.

Failure to comply with a UIC Permit or UIC regulations found at 40 CFR Parts 144 and 146 are violations of the Safe Drinking Water Act, 42 U.S.C. §300h and subject to enforcement by EPA.

Printed on Recycled Paper

If you have any questions concerning this letter, you may contact Ken Phillips at (303) 312-6405. Also, please direct all correspondence to the attention of Ken Phillips at Mail Code 8ENF-T.

Sincerely,

Elisabeth Evans

Elisabeth Evans, Director
Technical Enforcement Program

T. nsmission Repor

Date/Time 3-24-03;15:50
Local ID 303+312+6191
Local Name
Company Logo

This document was confirmed.
(reduced sample and details below)
Document Size Letter-S

TELEFAX
U.S. EPA REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405
FAX PHONE #: (303) 312-~~6071~~ 6409

TO: Roy Teter
AGENCY/FIRM: K.P Kauffman
MAIL CODE:
CITY/STATE:
FAX PHONE #: 303 833 3285 **PHONE #:**
NUMBER OF PAGES (including cover sheet):

sent 3-21-03 11:05 AM

FROM: EPA
OFFICE:
MAIL CODE:
PHONE:

REMARKS: Copy of permission to inject

Total Pages Scanned : 3 Total Pages Confirmed : 3

No.	Doc	Remote Station	Start Time	Duration	Pages	Mode	Comments	Results
1	331	93038333285	3-24-03;15:48	1'32"	3/ 3	EC		CP 9600

Notes :
EC: Error Correct
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CP: Completed
HS: Host Scan
HF: Host Fax
RE: Resend
MP: Multi-Poll
RM: Receive to Memory
HP: Host Print
HR: Host Receive
PD: Polled by Remote
PG: Polling a Remote
DR: Document Removed
FO: Forced Output
FM: Forward Mailbox Doc.
MB: Receive to Mailbox
PI: Power Interruption
TM: Terminated by user
WT: Waiting Transfer
WS: Waiting Send

C02115

Harlan Gerrish
08/06/03 06:32 AM

To: Paul Osborne/P2/R8/USEPA/US@EPA
cc:
Subject: Re: Class I Annulus pressure Monitoring-Gas blanket positive Pressure Design

Paul,
I should have reread this message yesterday before I faxed the one schematic I found. The schematic is pretty simplified; often the plumbing manages to be more complicated. As an alternative to the pressurized gas planket, some facilities use a fuel oil blanket. Pressure is maintained by a pump with high-low switches. This system seems to work better in some respects. It has the advantage of being an all-liquid system so tracking the system's material balance is more meaningful than anything you can do with a gas blanket.

The bottom of the pressure range is 100 psi greater than the permitted injection pressure in the DI wells. Ohio requires a 50 psi difference. The upper limit is established by the permittee. There is no permit requirement setting an upper limit. Some operators using a gas blanket maintain a constant pressure differential, which is not an advantage for anyone.

I think I responded to you that I took off on the day after our meeting ended. The BC's meeting was not too interesting to me because I haven't been involved in the big picture issues.

Paul Osborne

Paul Osborne
07/14/03 10:35 AM

To: Harlan Gerrish
Subject: Class I Annulus pressure Monitoring-Gas blanket positive Pressure Design

Harlan
Could you send me some Class I designs for maintaining and monitoring a positive pressure on the backside? Also some info on how the pressure range is established? Was good to see you in Denver. Was very glad that I did not attend the chiefs meeting.

Paul Stephen Osborne
National Ground-Water Expert
Region VIII UIC Program

CO2115

Paul Osborne
08/06/03 03:16 PM

To: Nathan Wiser/ENF/R8/USEPA/US@EPA
cc: Dan Jackson/P2/R8/USEPA/US@EPA, Sandra Stavnes/P2/R8/USEPA/US@EPA
Subject: Re: Annulus Monitoring--Wattenberg Disposal

Likewise, I do not recall seeing a copy of your NOV letter or hearing about it. I am sending the correspondence up to you so you can respond. Since this is apparentely a compliance issue, I see no need to be involved any further in this matter. In fact the pressure variance is bound to be large and meaningless on a well like this. I told John Atcheson that this requirement was a useless exercise back in 1988 when they made these changes.

By the way Kent wants to meet with you about this issue. I would suggest that you or Ken call him. Let Dan know what you decide about changing this Permit requirement. I presume that I would draft a minor Permit Modification.

Paul Stephen Osborne
National Ground-Water Expert
Region VIII UIC Program
Nathan Wiser

Nathan Wiser
08/06/03 02:39 PM

To: Paul Osborne/P2/R8/USEPA/US@EPA
cc:
Subject: Re: Annulus Monitoring--Wattenberg Disposal

Paul,

I don't recall seeing the incoming letter from Kent. From your proposed letter to him (that I commented on) it appears that he sent you a request to modify the permit regarding the annulus pressure mainenance requirement. Now you would like me to respond. In late July we sent Wattenburg a NOV citing the requirement to keep annulus pressure between 100 and 200 psi. So, as for their non-compliance, we don't have to say it again.

As for what type of permit requirement makes sense, what does Kent say? Does it make sense to remove the upper pressure maintenance limit? That would mean Wattenburg needs to maintain at least 100 psi on the well's annulus, period. One potential problem with this is that if there was an excess annular pressure associated with a loss of MI, it might be hard to discern.

--Nathan Wiser
Environmental Scientist
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, Colorado 80202
(303) 312-6211 office
(303) 312-6409 fax
wiser.nathan@epa.gov
Paul Osborne

Paul Osborne
08/05/03 05:30 PM

To: Nathan Wiser/ENF/R8/USEPA/US@EPA
cc: Dan Jackson/P2/R8/USEPA/US@EPA, Ken Phillips/ENF/R8/USEPA/US@EPA, Mario Salazar/DC/USEPA/US@EPA, Sandra Stavnes/P2/R8/USEPA/US@EPA
Subject: Re: Annulus Monitoring--Wattenberg Disposal

Nathan
I was merely trying to respond to Kent's letter. Perhaps you should have responded to this as you indicate that I am doing compliance work. I will turn it over to you tomorrow. Personally, I think that we need to provide guidance to operators as how to deal with a difficult situation. I think that is better than simply writing NOVs and throwing rocks rather than pointing folks in the correct direction. I would point out that this well is 9,400 feet deep and has a bottom hole pressure of about 250 degrees. That 2-7/8 tubing in a 5 inch hole makes for a great deal of thermal expansion and contraction. This is not your classic Region V or Region VI situation. Personally, I think that keeping a positive pressure on this deep a well is asinine, but that seems to be the nature of our rules.

Let me know what you decide about modifying this Permit to establish a more realistic set of numbers and I will prepare the mod. You might run your final cut at your compliance response by Dan when You complete it.

Paul Stephen Osborne
National Ground-Water Expert
Region VIII UIC Program
Nathan Wiser

Nathan Wiser
08/05/03 02:38 PM

To: Paul Osborne/P2/R8/USEPA/US@EPA
cc: Dan Jackson/P2/R8/USEPA/US@EPA, Ken Phillips/ENF/R8/USEPA/US@EPA, Mario Salazar/DC/USEPA/US@EPA
Subject: Re: Annulus Monitoring--Wattenberg Disposal

Paul,

While I think it is admirable that you are doing so much compliance assistance for this operator, I certainly would advise against giving the operator too many opportunities to evade compliance by claiming ignorance of a means to apply positive pressure to the annulus, as required in the permit (which was available in draft form to the operator during the PN period). I would add something at the close of the letter stating something to the effect that annulus pressure on the well above or below the permit limit will continue to be considered violations.

This letter in many ways indicates that EPA is willing to play a consulting role for the operator. To help you keep your sanity, you might want to forward specific names or entities that the operator might, himself, contact in order learn how to maintain positive annulus pressure. You refer to them in your letter. It might be best to have the operator do this work, freeing up some of your burden.

--Nathan Wiser
Environmental Scientist
U.S. EPA Region 8
999 18th Street, Suite 300
Denver, Colorado 80202
(303) 312-6211 office
(303) 312-6409 fax
wiser.nathan@epa.gov
Paul Osborne

Paul Osborne
08/05/03 12:49 PM

To: Nathan Wiser/ENF/R8/USEPA/US@EPA, Dan Jackson/P2/R8/USEPA/US@EPA, Ken Phillips/ENF/R8/USEPA/US@EPA, Mario Salazar/DC/USEPA/US@EPA
cc:
Subject: Annulus Monitoring--Wattenberg Disposal

Comments Please

WattenbergSucklafrms#1resptoMay12,2003letterwpd

Paul Stephen Osborne
National Ground-Water Expert
Region VIII UIC Program

Nathan Wiser
8ENF-T

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

TAB	GREEN	BLUE	CBI
		1	

Ref: 8P-W-GW

AUG 21 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U2 Entered
Date 9-18-03
Initial

Mr. Kent L. Gilbert
Senior Vice President
Kauffman Well Services, Inc.
1675 Broadway, Suite 2800
Denver, Colorado 80202-4628

RE: UNDERGROUND INJECTION CONTROL (UIC)
Request for a modification of Requirement for a Positive Pressure on the Casing/Tubing Annulus of the Wattenberg Disposal, LLC., Suckla Farms #1: **CO10938-02115**; Sec. 10 - T1N - R67W, 6th PM; Weld County, Colorado.

Dear Mr. Gilbert

This letter responds to your May 12, 2003, letter requesting a modification of Part II Section C. (7) of Permit No. CO10938-02115. Your letter indicated that you had been unable to maintain the required 100 to 200 psi positive pressure range on the annulus without experiencing extreme fluctuations when the well is shut in for an extended period. Your letter requested a modification of the Permit to allow the annulus to be maintained at zero pressure. As of today's date, EPA has not acted on that request.

To address these issues, we met on August 13, 2003. The Region has investigated the possibility of modifying your Permit to remove the positive pressure requirement. As discussed during our meeting, the UIC regulations at 40 CFR 146.13(a)(3) require that the casing/tubing annulus for all Class I wells be maintained under a positive pressure. The Region has been in contact with several States and Regions who have both Class I hazardous and non-hazardous wells. These Class I programs indicate that their operators have been able to design and install positive systems that work well. Many of these wells have installed systems that utilize nitrogen blankets to maintain a positive pressure on the backside. Owing to the cyclic nature of the operation of the Suckla Farms No. 1 well and the depth of the injection zone (especially a high bottom hole temperature, an extreme range in the annulus pressure occurs over the course of a

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week. The pressure range experienced in the annulus of the Suckla Farms No. 1 was much larger than anticipated. This large fluctuation led to the incident where the reported annulus pressure exceeded the criteria listed in Part II Section C. (7) of Permit No. CO10938-02115.

Several options were discussed during the August 13, 2003, meeting that would provide a procedure that would result in allowing the permittee to operate in compliance with the Suckla Farms No. 1 Permit while assuring that the well maintains mechanical integrity (no significant leaks in the tubing, casing or packer). It was decided that Wattenberg Disposal would carry out several week long studies over the next month to develop information on the range of annulus pressure fluctuations encountered at the facility over the course each week long test, with different starting positive pressures. The operator proposes to carry out these studies over the next month to develop information that EPA can use to develop a satisfactory modification of the Permit. Wattenberg Disposal, LLC will supply this information along with recommendations for a new operating procedure in the next quarterly report that is due on October 15, 2003.

In the interim, EPA is suspending enforcement of the requirement of the Permit at Part II Section C. (7) [To maintain a positive annulus pressure ranging from 100 to 200 psi], including the July 25, 2003 notice of violation letter which cites your violation of this requirement. This allows Wattenberg Disposal, L.L.C. to carry out the studies to develop information needed to modify this section of the Permit. The suspension of enforcement of Part II Section C. (7) of your Permit will remain in affect until the Permit has been modified, which we expect will occur shortly after our receipt of your study information and your recommended Permit Modification.

We will continue to work closely with you and your staff in the development of a procedure that will meet the regulatory requirements of the UIC Program while taking into account the construction configuration of the well and the operating procedure of the facility. If you have any questions, please contact either Mr. Paul S. Osborne at (303) 312-6125, Mr. Nathan Wiser at (303) 312-6211, or Mr. Ken Phillips at (303) 312-6405.

Sincerely,

Sandra Stavnes
Director
Ground Water Program

Sincerely,

Elisabeth Evans
Director
Technical Enforcement Program

cc: Mr. Robert EU Smith, OGWDW
Mr. Mario Salazar, OGWDW
Mr. Bruce Kobelski, OGWDW
Mr. Nathan Wiser, Region VIII

Co 2115

K. P. KAUFFMAN COMPANY, INC.
WORLD TRADE CENTER
1675 BROADWAY, 28TH FLOOR
DENVER, COLORADO 80202-4628

TELEPHONE (303) 825-4822
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RECEIVED
MAY 30 2003
EPA REGION VIII

May 12, 2003

Mr. Dan Jackson
EPA Region VIII - UIC
999 18th. St., Suite 300
Denver, CO 80202-2466

To: PSD 5/30/03

Dear Sir:

Pursuant to discussions I have had with Paul Osborne and Ken Phillips, I am sending in this request for change to Section C, Paragraph 7 under "Well Operation" as it pertains to "annular fluid".

Wattenberg Disposal has attempted to run a positive pressure cushion on the annulus of the Wattenberg Injection well. This has caused problems with the annular pressure. The problems are as follows:

1. When the well is injecting fluid, the pressure goes to zero and rides the hub of the pressure recorder. This is due to contraction because of colder fluid.

2. When the well is static (no fluid movement) for several days (i.e. over a weekend) the fluid heats up and expands, thus causing an increase in the annulus pressure.

Wattenberg Disposal recognizes the importance of backside pressure monitoring. We feel that it is important to set the scale at zero. We continuously monitor the backside pressure for annular anomalies. We have an automatic shut-off system in place to shut down the injection process should pressures exceed established limits. Periodically we conduct "unofficial" MIT's if we have any question whatsoever as to tubing or casing integrity.

Heat expansion
pressure blanket removed
LIFEPOOL USA Inc
PORTAGE, INDIANA
CHART NO. 0-100% UNIV. CHART
31 DAY
REMARKS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
http://www.epa.gov/region08

JAN 17 2003

Ref: 8ENF-T

CERTIFIED MAIL - 7002-0860-0005-3834-7395
RETURN RECEIPT REQUESTED

Mr. Kent L. Gilbert
Senior Vice President
K. P. Kauffman Company, Inc.
1675 Broadway, Suite 2800
Denver, CO 80202-4628

Re: UNDERGROUND INJECTION CONTROL (UIC)
Permission To Resume Injection
Suckla Farms #1
EPA Permit# CO10516-02115
Spindle Field
Weld County

Dear Mr. Gilbert:

On January 17, 2003, EPA received information fr
above referenced well concerning the workover and the fo
(MIT) conducted on January 17, 2003. The data submitte
required MIT. Therefore, pursuant to the above-referenced
of Federal Regulations (40 CFR) Section 144.51(q)(2), pe

Under continuous service, the next MIT will be du
well is to be temporarily abandoned (TA'd), EPA should b
more than two (2) years, it shall be plugged and abandone
unless sufficient reasons are provided by K. P. Kauffman C

Failure to comply with a UIC Permit or UIC regula
146 are violations of the Safe Drinking Water Act, 42 U.S.
by EPA.

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item 4 if Restricted Delivery is des
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so that we can return the card to
■ Attach this card to the back of the
or on the front if space permits.
1. Article Addressed to:
MR. KENT L. GILBERT
SENIOR VICE PRESIDENT
K.P. KAUFFMAN COMPANY, IN
1675 BROADWAY, SUITE 2800
DENVER, CO 80202-4628
JAN 21 2003
2. Article Number
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Domestic Return Receipt
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SENIOR VICE PRESIDENT
K.P. KAUFFMAN COMPANY, INC
1675 BROADWAY, SUITE 2800
DENVER, CO 80202-4628
Street, or PO B
City, St
PS Form

If you have any questions concerning this letter, you may contact Ken Phillips at (303) 312-6405. Also, please direct all correspondence to the attention of Ken Phillips at Mail Code 8ENF-T.

Sincerely,

Elisabeth Evans, Director
Technical Enforcement Program

****
*** TX REPORT ***
****

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
http://www.epa.gov/region08

Fax Transmittal Cover Sheet

TO Kent Gilbert

Agency / Company K.P. Kauffman Co.

City Denver State Co

Fax Number 303 825 4825
Phone Number
Number of Pages 3 incl. cover

From Nathan Wiser
Phone Number 303 312 6211

COMMENTS Authorization to Resume Injection: Suckla Farms #1 Well

CO2115

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8ENF-UFO

DEC 2 4 2003

CERTIFIED MAIL 7002 0860 0005 3835 1965
RETURN RECEIPT REQUESTED

Mr. Kent Gilbert
Senior Vice President
K.P. Kauffman Company, Inc.
1675 Broadway, Suite 2800
Denver, CO 80202-4628

Re: Underground Injection Control (UIC)
Request for Approval for Injection of
Nonhazardous Industrial Fluid
Suckla Farms #1 Well,
EPA Permit # CO10938-02115

Dear Mr. Gilbert:

The EPA is in receipt of your faxed request, dated December 10, 2003 in which you seek permission to inject approximately 300,000 gallons (7,143 barrels) of waste water used to test unspecified lines at a new power plant located in eastern Colorado. Your request included a copy of analyses of various constituents and properties from a sample of the fluid proposed for disposal.

In order to receive authorization from the EPA for disposal of this or any other industrial non-hazardous fluid into the subject well, Wattenberg Disposal, LLC (WD), must first meet the conditions as stated on page 13 of your well operating permit at Sections II(C)(6)(a) and (b), as restated below.

Section II(C)(6)(a) The permittee shall submit a request for disposal of fluids from any new source, prior to acceptance of the fluid for disposal. The request shall include the source name, location, operator, and a description of the operation that produced the waste fluid.

(b) The request shall include a complete analysis of the fluids, including cations, anions, BTEX, EP Corrosivity, EP Ignitability, EP Reactivity, and EP Toxicity using the Toxicity Characteristic Leaching Procedure for **all** listed parameters.

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Your December 10 analysis failed to fully comply with these two permit conditions. The request is deficient because it lacks the following:

(1) Results for all organic chemicals called for under the Toxicity Characteristic,
(2) BTEX results,
(3) Major anions and cations, and
(4) A more detailed description of the proposed source specifying the exact power plant and location generating the waste.

The EPA will, following review of all required analyses of the proposed fluid for disposal, determine if it is acceptable and if so, issue authorization as stated in Section II(C)(6)(c) of the permit.

Failure to comply with a UIC permit or UIC regulations found at 40 CFR Parts 144 and 146 are violations of the Safe Drinking Water Act, 42 U.S.C. §300h and are subject to enforcement by EPA.

If you have any questions concerning this letter, you may contact Ken Phillips at (303) 312-6405. Also, please direct all correspondence to the attention of Ken Phillips at Mail Code 8ENF-UFO.

Sincerely,

Elisabeth Evans

Elisabeth Evans
Director
Technical Enforcement Program

cc: Douglas Ikenberry
Solid Waste Unit, Compliance Program
Hazardous Materials & Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

bcc: Nathan Wiser ENF-UFO
Ken Phillips ENF-UFO
Paul Osborne 8PW-GW

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

CORRESPONDENCE COPY

Ref: 8ENF-UFO

DEC 2 4 2003

CERTIFIED MAIL 7002 0860 0005 3835 1965
RETURN RECEIPT REQUESTED

Mr. Kent Gilbert
Senior Vice President
K.P. Kauffman Company, Inc.
1675 Broadway, Suite 2800
Denver, CO 80202-4628

Re: Underground Injection Control (UIC)
Request for Approval for Injection of
Nonhazardous Industrial Fluid
Suckla Farms #1 Well,
EPA Permit # CO10938-02115

Dear Mr. Gilbert:

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In order to receive authorization from the EPA for disposal of this or any other industrial non-hazardous fluid into the subject well, Wattenberg Disposal, LLC (WD), must first meet the conditions as stated on page 13 of your well operating permit at Sections II(C)(6)(a) and (b), as restated below.

Section II(C)(6)(a) The permittee shall submit a request for disposal of fluids from any new source, prior to acceptance of the fluid for disposal. The request shall include the source name, location, operator, and a description of the operation that produced the waste fluid.

(b) The request shall include a complete analysis of the fluids, including cations, anions, BTEX, EP Corrosivity, EP Ignitability, EP Reactivity, and EP Toxicity using the Toxicity Characteristic Leaching Procedure for **all** listed parameters.

8ENF-UFO
N. Wise
12-17-03

Printed on Recycled Paper

Your December 10 analysis failed to fully comply with these two permit conditions. The request is deficient because it lacks the following:

(1) Results for all organic chemicals called for under the Toxicity Characteristic,
(2) BTEX results,
(3) Major anions and cations, and
(4) A more detailed description of the proposed source specifying the exact power plant and location generating the waste.

The EPA will, following review of all required analyses of the proposed fluid for disposal, determine if it is acceptable and if so, issue authorization as stated in Section II(C)(6)(c) of the permit.

Failure to comply with a UIC permit or UIC regulations found at 40 CFR Parts 144 and 146 are violations of the Safe Drinking Water Act, 42 U.S.C. §300h and are subject to enforcement by EPA.

If you have any questions concerning this letter, you may contact Ken Phillips at (303) 312-6405. Also, please direct all correspondence to the attention of Ken Phillips at Mail Code 8ENF-UFO.

Sincerely,

Elisabeth Evans
Director
Technical Enforcement Program

cc: Douglas Ikenberry
Solid Waste Unit, Compliance Program
Hazardous Materials & Waste Management Division
Colorado Department of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

bcc: Nathan Wiser ENF-UFO
Ken Phillips ENF-UFO
Paul Osborne 8PW-GW

C010938-02115

K. P. KAUFFMAN COMPANY, INC.
WORLD TRADE CENTER
1675 BROADWAY, 28TH FLOOR
DENVER, COLORADO 80202-4628

TELEPHONE (303) 825-4822
FACSIMILE (303) 825-4825
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TAB		1	

RECEIVED
OCT 1 8 2003
Office of Enforcement
Compliance & Environmental
Justice

October 14, 2003

United States Environmental Protection Agency
Region 8
999 18th. Street, Suite 300
Denver, CO 80202-2466
Attention: Director

Dear Sir,

Enclosed is the quarterly report for the Wattenberg Disposal and results from the annular pressure test evaluation conducted in August and September, 2003 at the Wattenberg Disposal.

The annulus was pressurized using a compressor. The following results were observed:

1. When the annulus was pressured from 40 to 145 psi, the pressure would go to zero.
2. When 145 psi was re-pressurized daily, the pressure would ultimately go to zero. However, it would hold 20-40 psi for a short time.
3. Wattenberg Disposal has set up a compressor to constantly keep the back-side pressure at 100 psi. If the annulus pressure drops when the well is being injected into, the compressor will re-pressure the backside to 100 psi.
4. We did not see the huge pressure spikes we observed when using fluid on the annulus for pressure maintenance.

Wattenberg Disposal proposes to continue pressurizing the annulus to 100 psi with compressed air (compressor) and monitor pressures. .

Sincerely,

Kent L. Gilbert

Kent L. Gilbert
Wattenberg Disposal

U2 Entered
Date 10/17/03
Initial SAP

KLG/mg
cc: Watt.Disp.

Co 2115

K. P. KAUFFMAN COMPANY, INC.
WORLD TRADE CENTER
1675 BROADWAY, 28TH FLOOR
DENVER, COLORADO 80202-4628
TELEPHONE (303) 825-4822
FACSIMILE (303) 825-4825
www.kpk.com

TAB	GREEN	BLUE	CBI
		2	

RECEIVED
AUG 22 2003
Office of Enforcement
Compliance & Environmental
Justice

August 18, 2003

Mrs. Elisabeth Evans
Director, Technical Enforcement Program
Underground Injection Control
Region VIII, EPA
999 18th. St., Suite 300
Denver, CO 80202-2466

Re: Wattenberg Disposal
Suckla Farms #1
EPA ID #10938-0245

Dear Mrs. Evans,

In response to your letter of July 24, 2003 the following action has been taken.

A meeting was held on Wednesday, August 13, 2003 between the EPA Region VIII UIC and representatives from Wattenberg Disposal. Those present were:

Nathan Wiser - EPA
Ken Phillips - EPA
Paul Osborne - EPA
Kent Gilbert - Wattenberg Disposal
Roy Teter - Wattenberg Disposal
Gordon Allott - Wattenberg Disposal

The discussion was centered on the pressure blanket requirements and how to comply with the regulations. The result of the meeting is as follows:

A letter will be issued by the EPA granting Wattenberg a stay to determine the validity of testing various backside pressures for the pressure blanket. The stay will be in effect until 10/01/03 at which time the results will be tabulated and included with the quarterly report due to the EPA by 10/15/03. At that time, a determination will be made from the results of the data gathered. It will be decided what the optimal pressure blanket setting on the annules will be and what (if any) pressure restrictions shall be imposed.

If you have any questions, please feel to call.

Sincerely

Gordon L. Allott, Jr.. Esq.
Exec. VP - Wattenberg

GLA/KLG/mg
cc: Ken Phillips, EPA

CO2115

Memorandum

To: **Paul Osborne Region VIII EPA, UIC**

CC: **Ken Phillips Region VIII EPA, UIC**

From: Kent L. Gilbert, Wattenberg Disposal

Date: 08/05/03

Re: Wattenberg Disposal Compliance

Pursuant to our discussion today I appreciate your assistance on our behalf regarding the pressure blanket compliance issue at Wattenberg. The depth of the well (9,200') and the bottom hole temperature (250-300 degrees Fahrenheit) appear to big the main contributors to the pressure problem.

When water is being injected, the tubing string contracts and the pressure goes to zero. When the well is shut in overnight, the intense heat swells the tubing, and heats the fluid on the backside, it expands and the pressure rises.

We appreciate any assistance you can give us regarding this matter.