Exploration and Production Waste

How CDPHE and COGCC Interact to Regulate the E&P Waste Stream

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Centralized Facilities
Operated for non-commercial purposes (not charging for disposal or selling treated water)
Can accept multiple operators’ water under an agreement, but not for commercial purposes
Facilities can be located out of the oil field

Commercial E&P Treatment Facility
A facility accepting E&P waste for commercial disposal or recycling
E&P waste becomes a solid waste when it enters a commercial facility-no longer maintains solid waste exemption
Underground Injection
COGCC regulates injection, and facilities appertuant to the well;

CDPHE oversees recycling or other commercial activities that occur beyond or before the injection (recycling or treatment)

Coordination
Recycling at UIC wells
Beneficial use for dust suppression
Beneficial use of cuttings
Beneficial use of solid waste at drill sites

Commercial Recycling
CDPHE requires Design and Operations Plans for the recycling activities occurring at commercial facilities;

CDPHE’s reviews determines whether or not the facility’s design and operations are consistent with the Section 8 criteria

Commercial Impoundments
Regulated by Section 17, of the Solid Waste Regulations

– Doug Eagleton will present on waste impoundments
Commercial Landfarms/Landfills

May be permitted as landfill or obtain recycling designation when:

• Turnover rate is 75% of material in inventory and accepted annually,
• Designed to the same protective standard as disposal facilities (with a Certificate of Designation), and
• Recycled material will meet CDPHE’s unrestricted use standards

Beneficial Use of Recycled Water

CDPHE reviews beneficial use plans for water treated at a commercial recycling facility;

Plans requirements vary depending on proposed uses, but the beneficial use may not negatively impact groundwater and water may not be land applied at greater than the evapotranspiration rate

Thanks!

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