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Water Quality Control

July 22, 2014

Andrea Beebout
QECD-B2-CWE
Water Quality Control Division
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive S.
Denver, Colorado 80246-1530

Subject: COG840016 – Ann Allison #1, Ritchie Exploration Inc.
Compliance Advisory Response, July 2014

Dear Ms. Beebout:

Ritchie Exploration received a compliance advisory regarding the subject facility dated July 9, 2014. The advisory is in reference to a reported effluent limit violation. The effluent limit that was exceeded was the amount of flow discharged. The following explanation is provided as requested in your letter:

Outfall 001A:

- Parameter 50050 – Flow in conduit or through treatment plant: The permit limit is 0.0076 million gallons per day (MGD) over a 30-day average, which correlates to approximately 5.2 gallons per minute as measured at the outfall. Historical flow records indicate that this flow rate is appropriate over a 12-month period.
- In both January and February, precipitation events contributed to above-average effluent flow amounts. The amount of water produced from the oil well varies, and cannot be controlled. As the pits are open, precipitation entering the pits and therefore increasing flow also cannot be controlled. In order to solve this, Ritchie will request a permit renewal with a higher maximum flow to accommodate variations in produced water as well as potential influx due to precipitation amounts.

Ritchie is committed to maintaining compliance with the discharge at the facility. The permit renewal for this facility was recently submitted, and when the new permit is received Ritchie will work with the Division to correct any errors on the DMR templates to reduce confusion. Please contact the undersigned with any questions or concerns.

Sincerely,

John Niernberger, Production Manager
Ritchie Exploration, Inc.