



February 21, 2014

Colorado Department of Public Health and Environment  
Water Quality Control Division  
4300 Cherry Creek Drive South WQCD-P-B2  
Denver, Colorado 80246-1530

**RE: CPDS Certification COG8400002 Renewal  
GreenBack Produced Water Recovery, LLC  
CGRS Project No. 11727**

Dear Sir or Madam,

CGRS, Inc. is the contract design, build and operator for Greenback Produced Water Recovery, LLC's Schaeffer Ranch facility located south of Rifle Colorado. This facility discharges to a dry ditch that drains to Mamm Creek under CDPS certification COG8400002. This certification expires on August 15, 2014. CGRS, acting on behalf of GreenBack Produced Water Recovery, LLC is submitting this application for renewal of that certification. It is our understanding that by submitting this application for certification renewal six months prior to the simultaneous expiration of General Permit for Discharges Associated with Produced-Water Treatment Facilities (COG840000) and GreenBack's current certification COG8400002, GreenBack is authorized to continue to discharge under an administrative extension of both the General Permit and the certification until such time as the General Permit and the certification are renewed.

An explanation for some of the areas in the application form seems appropriate:

1. All of the chemical treatments utilized in the process are proprietary. MSDS for the three chemicals are provided.
2. The impoundments on the site are double lined and monitored to prevent discharge to groundwater.
3. A letter from Harold Schaeffer, owner of the property surrounding the facility, authorizing discharge to his property is included.
4. Analytical data from composite sampling of state waters upstream of the discharge are not presented as upstream flow is intermittent.
5. Complete effluent sampling results as required by the current certification from October of 2013 is attached.
6. GreenBack does not use or manufacture any of the compounds listed under dioxin testing and has no reason to believe that TCDD is or may be present in an effluent.
7. WET testing data are not included as the facility is subject to routine testing under the existing CDPS permit.
8. The applicant has conducted priority pollutant testing for the pollutants listed in appendix A and B and has no reason to believe that any of the listed pollutants are in its discharge. In

addition any pollutant in the list that could be present would be solely because of its presence in the intake water.

9. All of the WET testing on discharge water that has been conducted in the last three years is included in the submitted DMR's.

10. The facility is covered under industries in Appendix C in SIC code 13. However, as indicated in note (b), Colorado Discharge Permit System Regulations, Section 61.4(3)(b)(i)(C), the facility is not subject to the requirement to submit a permit application as none of the exceptions listed in (i), (ii), or (iii) are applicable.

11. Appendix D is not applicable since the facility does not discharge to groundwater other than a septic system at less than 2000 gpd.

12. A detailed plan and side view of the ponds and their (60 mil) liners is provided.

13. A site investigation report is included that reports that groundwater was not encountered in drilling to 27 feet below ground surface and that the local water table is estimated to be greater than 100 feet below ground surface.

14. Tables of the liner type and specifications are included. Included in those tables is the liner transmissivity.

15. The technical specifications for liner installation are included.

If you have questions or need additional information, please contact me.

Sincerely,  
**CGRS, Inc.**



Douglass H. Brown  
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