



Department of Environmental Quality



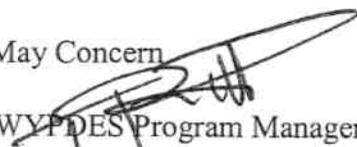
To protect, conserve and enhance the quality of Wyoming's environment for the benefit of current and future generations.

Dave Freudenthal, Governor

John Corra, Director

MEMORANDUM

To: To Whom It May Concern

From: Todd Parfitt, WYPDES Program Manager 

Date: April 14, 2005

Subject: Integration of Groundwater Monitoring Requirements for CBM Ponds into WYPDES Permits

This memorandum replaces the September 22, 2004 "Clarification of the Integration of Groundwater Monitoring Requirements for CBM Ponds into the NPDES Permitting Process" memorandum.

The WYPDES program will no longer delay the issuance of individual WYPDES permits while waiting for confirmation of compliance with the "Compliance Monitoring for Ground Water Protection Beneath Unlined Coalbed Methane Produced Water Impoundments" (the GW Guideline).

The GW Guideline will be integrated into the WYPDES program as follows:

A. Individual Permits

1. WYPDES permits that include the use of CBM ponds or impoundments will contain an enforceable condition that specifies outfalls are not authorized to discharge until a written groundwater compliance approval has been issued by the GPC program. The GPC compliance approval will consist of either a final approved groundwater compliance monitoring plan or written authorization for an exemption thereof.
2. Compliance with the GW Guideline will be determined by the WQD Groundwater Pollution Control (GPC) program.
3. The GPC program will determine the appropriate regulatory requirements for groundwater monitoring and reporting. Compliance with any groundwater monitoring or reporting requirements will be administered by the GPC program.

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B. General Permits

1. Permit authorizations that have not been approved and signed by the WYPDES program prior to August 1, 2004, must comply with the GW Guideline before the WDEQ will sign the WYPDES permit authorization. Produced water may not be discharged to the surface without a WYPDES permit authorization signed by the WQD Administrator or NPDES program staff.
2. Use of the Coal Bed Methane General Permit for Temporary Discharges for drought relief will be subject to the requirements of B.1.above.
3. Use of the Coal Bed Methane General Permit for ground water quality characterization, if deemed necessary and appropriate by the WQD, will be limited to no more than 15 days of discharge and will not be subject to the conditions of B.1. above.

Additional questions regarding the integration of groundwater monitoring requirements for CBM ponds into the WYPDES permitting process may be directed to me at 307-777-6709 or tparfi@state.wy.us or to Kevin Frederick, GPC Program Manger at 307-777-5985 or kfrede@state.wy.us.

TTP/jd/5-0484

cc: John Wagner, WQD Administrator
Kevin Frederick, GPC Program Manager
Leah Krafft, WYPDES Permitting Supervisor
Brian Lovett, WYPDES Compliance and Inspection Supervisor