



Memorandum

To: Interested Parties

From: Don Fischer, North District Groundwater Section Supervisor

Date: April, 2010

RE: Changes to Guidance Document entitled: *"Compliance Monitoring and Siting Requirements for Unlined Impoundments Receiving Coalbed Methane Produced Water"* Revised, April, 2010

The WDEQ North District Groundwater Section recently performed a review of all groundwater analytical data submitted since the inception of the monitoring requirements for CBM impoundments in August, 2004. The above referenced WDEQ document was modified in April, 2010 to reflect changes in monitoring requirements that result from the study. The sections of the document that have been modified are discussed below:

Section 3.05 and Section 4.06:

The WDEQ is no longer requiring that the operator install additional monitoring wells to establish the groundwater gradient in a confined (artesian) aquifer system. The initial monitoring well that is installed to investigate the presence and quality of groundwater should be installed in the apparent down-gradient location from the produced water impoundment. In most cases, this location should suffice for groundwater protection purposes. The WDEQ Groundwater Section will evaluate the data submittals on the confined aquifer systems and determine the monitoring requirements on a case by case basis.

Section 4.10

The WDEQ has modified the compliance sampling frequency for new and existing facilities. The new schedule will be determined on a case by case basis, based on reviews of hydrogeologic data and analytical reports.

Section 4.11

The WDEQ no longer requires the analysis for arsenic in the groundwater. Detailed analysis of groundwater samples reveals that arsenic is not a parameter of concern in groundwater beneath the cbm impoundments.

Please direct all questions to Don Fischer, WDEQ, Groundwater Section, Phone 307-673-9337 or email: dfisch@wyo.gov.

End of Memorandum