

From: Mollie.Mangerich@deq.idaho.gov
To: [Comments](#)
Cc: Mollie.Mangerich@deq.idaho.gov
Subject: IDEQ Solid Waste Program comments: CPC Mineral LLC's Directional Application to drill Well Federal 20-3
Date: Sunday, November 06, 2016 02:24:30 PM

Mr. Thurn,

Thank you for providing the Idaho Department of Environmental Quality (IDEQ) – Solid Waste Program an opportunity to review and comment on the Directional Application to Drill CPC Mineral LLC well Federal #20-3 located at SE 1/4/ NW 1/4, Section 20, T3S, R43E, in Bonneville County, ID. IDEQ staff reviewed the application and drilling plan for the proposed wells and submits the following comments for your consideration.

While certain oil and gas exploration and production (E&P) wastes are exempt from regulation as hazardous wastes under 40 CFR Subtitle C of the Resource Conservation and Recovery Act (RCRA), the exemption did not preclude these wastes from control under state Statutes and Rules, nor under the RCRA 40 CFR Part 258 Subtitle D Solid Waste Regulations, or under other federal regulations. The exemption does not mean these wastes could not present a hazard to human health and the environment if improperly managed.

1. Federal 20-3 Drilling Prognosis, page 2. No. 5 Mud Program. The applicant states that no reserve pit will be used and all drill cutting materials will be hauled from the location to a permitted waste facility.
 - a. The applicant shall contact the DEQ's Regional Office in Idaho Falls prior to selection of disposal location in order determination be made as to volume and characteristics of wastes to be disposed. Analytical parameters may be required, and may include, but not be limited to, select heavy metals, volatile organic compounds, semi-volatile organic compounds, and radiological parameters.
2. Standard Planning Report, Federal 20-3 Erosion and Sediment Control BMPS, page (not identified). Section X.5 Protect Slopes. In Paragraph one, the applicant proposes to construct retention ponds and swales, and the temporary slope protection for these ponds and swales will be achieve through the use of chemical dust suppressants or straw bales. Please identify:
 - a. Location of proposed retention ponds and drainage swales on a Map Section X.8 Retain Sediment Onsite. The applicant will used silt fencing to limit transport of sediment from construction areas to offsite drainages when necessary. Please identify:
 - b. The offsite drainage areas on a Map.

Sincerely,

Mollie Mangerich
Solid Waste Program Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton

Boise, ID 83706

phone: 208-373-0121

fax: 208-373-0154

Mollie.Mangerich@deq.idaho.gov