



REGION 8

DENVER, CO 80202

FACT SHEET

Modification #1 (Major)

East Cherry Creek Valley Water and Sanitation District

DI-1, DI-2, and DI-3 Wells

Adams County, Colorado

Class I Industrial Disposal Wells

CO12143-00000

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This Fact Sheet explains the reasons for the revisions incorporated into Draft Permit Modification No. 1 (Major).

On April 13, 2026, the Permittee requested, pursuant to 40 CFR Section 144.39, a modification to APPENDIX A. WELL CONSTRUCTION REQUIREMENTS for the DI-1 well and Appendix E – Plugging and Abandonment requirements for the DI-1 well permit conditions. Furthermore, EPA has modified the permit to include clarifying language specifying that the packer depths for the DI-2 and DI-3 wells remain at 100 feet above the top open perforation as described in APPENDIX A. WELL CONSTRUCTION REQUIREMENTS.

East Cherry Creek Valley Water and Sanitation District (the Permittee) request a modification to APPENDIX A. WELL CONSTRUCTION REQUIREMENTS for the DI-1 well conditions to replace and/or add permit conditions. On March 10, 2026, the Permittee observed an increase in tubing casing annulus pressures, with readings ranging between 102 psi and 301 psi. In Notice of Violation letters dated March 24, 2026 and March 31, 2026, EPA informed the Permittee of the requirement to maintain the tubing casing annulus pressure between 0 and the lessor of either 100 psi or 10 percent of the tubing pressure.

The Permittee has submitted a plan to address this noncompliance by requesting a modification of permit conditions so that they may set a new packer and tubing with a similar design as described in the final permit, but at a shallower depth. New tubing of the same specifications proposed for installation is 4.5-inch, 11.6 lb/ft., N-80 LTC with TK-805 internal coating. The proposed new packer has the same design: Perma Pac 7.0-inch x 4.0-inch, 23-32# latch type. The new packer and future packers are to be placed at a depth of 140 ft. above the top open perforation at 9,152 ft., which is approximately 359 ft. below the top of the Lykin upper confining zone that exists between the depths of 8,683 ft. - 9,150 ft. Also, EPA found competent cement behind the 7-inch casing between the depths of 9,012 ft. to 9,052 ft., which is where the additional packer(s) may be placed. EPA has determined that allowing an additional 40 ft. for packer placement will still be protective of USDWs. The packers remain within the upper confining zone, where there is competent cement behind the well casing.

Specifically, the Permittee proposes to:

- Install a new packer in the DI-1 well at a depth of 9,042 feet (ft.);
- Leave the failed packer in place at 9,052 ft.;
- Allow future packers to be placed between 9,012 ft. and 9,042 ft., changing the current condition from requiring packer placement within 100 ft. of the top open perforation to allowing packer placement within 140 ft. of the top open perforation at 9,152 ft. The Permittee requested the additional 40 additional feet in the event that another packer needs to be placed above the packer at 110 ft.; and
- Packers may remain in place unless they prevent passage of geophysical logging tools or cement cannot be delivered to its targeted zone during the plugging of the well. If either activity is compromised the packers must be removed.

A major modification is also proposed for the plugging and abandonment (P&A) procedures in Appendix E for the DI-1 well. Packers may remain in the well if the injection zone can be isolated as described in the new plugging and abandonment plan, and in accordance with applicable regulations to protect USDWs. The Permittee proposes to:

- Install all cement plugs identified in the P&A plan for the DI-1 well by pumping cement through all existing packers, taking into account packer depths; and
- Leave packers in place if successful isolation of the injection zones can be achieved, otherwise packers must be removed.