

## Dave Kubeczko - DNR

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**From:** Dave Kubeczko - DNR  
**Sent:** Saturday, May 27, 2017 1:00 PM  
**To:** Dave Kubeczko - DNR  
**Subject:** Resend of: TEP Rocky Mountain LLC (Terra), Trail Ridge Pit 11-5-697 Location, NWNW Sec 5 T6S R97W, Garfield County, Form 2A#401261983 and Form 15#401261675 Review

**Importance:** High

**Categories:** Operator Correspondence

Scan No. 2108173      CORRESPONDENCE      2A #401261983      15 #401261675

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**From:** Vicki Schoeber [mailto:[VSchoeber@terraep.com](mailto:VSchoeber@terraep.com)]  
**Sent:** Thursday, May 25, 2017 11:34 AM  
**To:** Kubeczko - DNR, Dave  
**Subject:** RE: Resend: TEP Rocky Mountain LLC (Terra), Trail Ridge Pit 11-5-697 Location, NWNW Sec 5 T6S R97W, Garfield County, Form 2A#401261983 and Form 15#401261675 Review  
**Importance:** High

Dave,

TEP Rocky Mountain LLC has reviewed the attached proposed COAs for the Trail Ridge Pit 11-5-697 Form 2A and Form 15, and is in concurrence with attaching them to the forms.

Thank you.

Vicki Schoeber

Regulatory Specialist  
TEP Rocky Mountain LLC  
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**From:** Kubeczko - DNR, Dave [mailto:[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)]  
**Sent:** Wednesday, May 24, 2017 12:36 PM  
**To:** Vicki Schoeber <[VSchoeber@terraep.com](mailto:VSchoeber@terraep.com)>; Mike Gardner <[MGardner@terraep.com](mailto:MGardner@terraep.com)>  
**Subject:** Resend: TEP Rocky Mountain LLC (Terra), Trail Ridge Pit 11-5-697 Location, NWNW Sec 5 T6S R97W, Garfield County, Form 2A#401261983 and Form 15#401261675 Review

Vicky and Mike,

I have been reviewing the TEP Rocky Mountain LLC (Terra), Trail Ridge Pit 11-5-697 Location **Form 2A #401261983** and **Form 15 #401261675**. COGCC would like to attach the following conditions of approval (COAs) based on the data

Terra has submitted on or attached to the Form 2A and Form 15 prior to passing the Oil and Gas Location Assessment (OGLA) review.

**Planning:** The following conditions of approval (COA) will apply:

**COA 91** - In addition to the notifications required by COGCC listed in the **Northwest Notification Policy (Notice of Intent to Construct a New Location, Notice of Intent to Spud Surface Casing, and Notice of Intent to Commence Hydraulic Fracturing Operations)** and **Rule 316C. COGCC Form 42. FIELD OPERATIONS NOTICE (a. Notice of Intent to Conduct Hydraulic Fracturing Treatment and c. Notice of Construction or Major Change)**; operator shall notify the COGCC 48 hours prior to start of pit location construction, pit liner installation, start of hydrostatic test, start of first use of pit for operations, pipeline testing, onsite and offsite pipeline testing (any permanent buried or temporary surface lines used for hydraulic stimulation and/or flowback operations), and start of hydraulic stimulation operations using the Form 42 (as described in **Rule 316C.m. Notice of Completion of Form 2/2A Permit Conditions**). The appropriate COGCC individuals will automatically be email notified.

**COA 99** - Operator shall comply with all provisions of the **NOTICE TO OPERATORS (NTO) DRILLING WELLS WITHIN ¾ MILE OF THE RIM OF THE ROAN PLATEAU IN GARFIELD COUNTY - PIT DESIGN, CONSTRUCTION, AND MONITORING REQUIREMENTS, dated June 12, 2008**.

**COA 95** - Operator shall provide four (4) color photographs of the reference area, taken during the growing season of vegetation and facing each cardinal direction, within twelve (12) months after approval of the Form 2A permit. Each photograph shall be identified by date taken, well or Oil and Gas Location name, and direction of view.

**Location Construction:** The following conditions of approval (COAs) will apply to construction of the multi-well pit location:

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at the well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices [BMPs] associated with fluid containment/control as well as stormwater management for the control of run-on and run-off) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals as required by CDPHE (at least every 14 days and after precipitation events), and maintained in good condition.

**COA 24** - The design/build of any perimeter berm or fluid management structures shall be sized, constructed, and compacted sufficiently to contain and/or manage potential fluid releases during operations in a manner that prevents or controls potential sedimentation and scouring on adjacent lands and drainages. Such design/build of perimeter berms or fluid management structures may include, but are not limited to the following: on location berms; diversion ditches; enhanced vegetation; or other design features necessary to achieve the goal of protecting adjacent lands and drainages from potential sedimentation and scouring.

**COA 28** - The location is in an area of moderate to high run-on/run-off potential; therefore standard stormwater BMPs must be implemented; prior to, during, and after well pad location re-construction, as well as during drilling, completion, and production operations; at this location to insure compliance with CDPHE and COGCC requirements and to prevent any stormwater run-on and /or stormwater run-off.

**COA 44** - The access road will be constructed maintained as to not allow sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

**COA 76** - Strategically apply fugitive dust control measures, including encouraging established speed limits on private roads, to reduce fugitive dust and coating of vegetation and deposition in water sources.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (corrugated steel with liner or equivalent) to contain any spilled or released material around temporary or permanent condensate/oil and /or produced water storage tanks.

**Earthen Pit Construction:** The following conditions of approval (COAs) will apply to both the Form 2A and the Form 15 Pit Permits for construction of the multi-well pit and ancillary facilities:

**COA 47** - The multi-well pit must be double-lined. The pit will also require a leak detection system (Rule 904.e).

**COA 66** - Delivery and vacuum truck hoses will not be allowed to be placed directly onto the pit liner. Operator will construct a loading/unloading station located next to the pit, to deliver fluids to or remove fluids from the pit by truck. The loading/unloading station shall be designed and utilized to prevent hoses from being dropped into the pits and dragged over the liner, which could lead to liner damage. The loading/unloading station will be the only permitted access for manual fluids transfers to or from the pit. Vehicles will not be allowed to approach the pit any closer than the loading/unloading station. Each station will have a catch basin in case a leak occurs while operations personnel are connecting or disconnecting hoses. Signs clearly marking the truck loading/unloading station shall be provided and maintained by the operator.

**COA 61** - Operator must submit a professional engineer (PE) approved/stamped as-built drawing (plan view and cross-sections) of the multi-well pit and the oil and gas location (including all tanks and other pit operations equipment) within 30 calendar days of construction of all the location, pit, and all operating equipment.

**COA 22** - After installation of the uppermost liner and prior to operating the pit, the synthetic liner(s) shall be tested by filling the pit with at least 70 percent of operating capacity of water, measured from the base of the pit (not to exceed the 2-foot freeboard requirement). The operator shall monitor the pit for leaks for a period of 72 hours prior to either draining the pit or commencing operations. Operator shall notify the COGCC 48 hours prior to start of the hydrotest using the Form 42. Hydrotest monitoring results must be maintained by the operator for the life of the pit and provided to COGCC prior to using the pit via a Form 4 Sundry.

**COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

**COA 59** - The multi-well pit must be fenced and netted. The operator must maintain the fencing and netting until the pit is closed.

**COA 6** - Additional containment shall be required where temporary or permanent pumps and other necessary equipment or chemicals are located.

**COA 74** - Operator will use adequately sized containment devices for all chemicals and/or hazardous materials stored or used on location.

**COA 40** - Operator will implement measures to ensure that adequate separation of hydrocarbons from the influent occurs to prevent accumulation of oil on the surface of stored completions fluids. Operator shall also employ a method for monitoring buildup of phase-separated hydrocarbons on the surface of stored fluids.

**COA 41** - No oil is permitted on the surface of completions fluids.

**COA 19** - This multi-well pit will comply with **Rule 902. PITS - GENERAL AND SPECIAL RULES. e.** Pits used for a period of no more than three (3) years for storage, recycling, reuse, treatment, or disposal of E&P waste or fresh water, as applicable, may be permitted in accordance with **Rule 903** to service multiple wells. The three year time clock will start from the date of first use after hydrostatic testing and be based on submittal of the Form 42 providing that date.

**COA 29** - The operator shall submit, and receive approval of, a reuse and recycling plan per **Rule 907.a.(3)**, prior to any offsite reuse/recycling of pit fluids.

**COA 27** - The multi-well pit shall be closed in accordance with Rule 905. Closure of Pits, and Buried or Partially Buried Produced Water Vessels; with an approved Site Investigation and Remediation Workplan, Form 27.

**Completions Operations:** The following conditions of approval (COAs) will apply to the pit location and to locations where hydraulic stimulation operations will occur:

**COA 25** - Flowback and stimulation fluids must be sent to enclosed tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline storage vessel, or other open top containment located on the well pad; or into tanker trucks for offsite disposal. No open top tanks can be

used for initial flowback fluids containment. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area constructed to be sufficiently impervious to contain any spilled or released material. No additional downgradient berming is required if operator constructs a sufficiently sized perimeter berm.

**COA 26** - Potential odors associated with the completions process and/or with long term production operations must be controlled/mitigated.

**Material Handling and Spill Prevention:** The following conditions of approval (COAs) will apply to this Form 2A Permit if any temporary surface (**COAs 45, 49, 54, and 55**) or buried permanent (**COA 45**) flowlines and/or offsite pipelines (poly or steel) are used during operations at the multi-well pit location as well as nearby well pad locations:

**COA 45** - Operator shall pressure test pipelines (flowlines from wellheads to separators to tanks; pipelines from onsite separators to offsite storage tanks, and any temporary surface lines used for hydraulic stimulation and/or flowback operations) in accordance with Rule 1101.e.(1) prior to putting into initial service any temporary surface or permanent buried pipelines and following any reconfiguration of the pipeline network, and tested annually, unless agreed to by both parties that the flowlines can be managed under an approved COGCC variance.

**COA 49** - Operator must routinely inspect the entire length of the surface pipeline to ensure integrity. Operator shall conduct daily inspections of surface poly pipeline routes for leaks during active transfer of fluids and implement best management practices to contain any unintentional release of fluids along all portions of the surface pipeline route where temporary pumps and other necessary equipment are located. Inspections shall be conducted by viewing the length of the pipeline; operator will endeavor to minimize surface disturbance during pipeline monitoring. In addition, pump stations along the surface poly or steel pipeline route will be continuously monitored when operating in order to swiftly respond to such a failure.

**COA 54** - Operator will implement BMPs necessary to mitigate a potential for a release of fluids to impact streams, intermittent streams, ditches, and drainage crossings. For these crossings: if poly pipe is used on the surface, operator will ensure appropriate containment by either installing over-sized pipe "sleeves" which extend the length of the crossing and beyond to a distance deemed adequate to capture (catchment basins) and/or divert any possible release of fluids and prevent fluids from reaching the stream or drainage; installing over-sized pipe "sleeves" which extend the length of the crossing and installing shut off valves on either side of crossing instead of catchment basins; or develop an alternative means for containment. For all other pipeline materials, operator will implement BMPs necessary to mitigate a potential for E&P fluids not to reach groundwater or flowing surface water.

**COA 55** - Operator will utilize, to the extent practical, all existing access and other public roads, and/or existing pipeline right-of-ways, when placing/routing the temporary surface pipelines. This will reduce surface disturbance and fragmentation of wildlife habitat in the area.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A and Form 15 permits prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG  
Oil and Gas Location Assessment Specialist  
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If you have any question, please call me on my cell phone at (970) 309-2514, or email me. Thanks.

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