

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
Document Number: 401259697			
Date Received:			

SUNDRY NOTICE

Submit a signed original. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full in Comments or provide as an attachment. Identify Well by API Number; identify Oil and Gas Location by Location ID Number; identify other Facility by Facility ID Number.

OGCC Operator Number: 96850 Contact Name Michael Gardner
 Name of Operator: TEP ROCKY MOUNTAIN LLC Phone: (970) 623-4875
 Address: PO BOX 370 Fax: (970) 285-9573
 City: PARACHUTE State: CO Zip: 81635 Email: mgardner@terraep.com

Complete the Attachment
Checklist

OP OGCC

API Number : 05- 103 00 OGCC Facility ID Number: 433759
 Well/Facility Name: NE Ryan Gulch Wtr Recycling Pit Well/Facility Number: _____
 Location QtrQtr: NWNE Section: 25 Township: 1S Range: 98W Meridian: 6
 County: RIO BLANCO Field Name: SULPHUR CREEK
 Federal, Indian or State Lease Number: _____

Survey Plat		
Directional Survey		
Srfc Eqpmt Diagram		
Technical Info Page		
Other		

CHANGE OF LOCATION OR AS BUILT GPS REPORT

- Change of Location * As-Built GPS Location Report As-Built GPS Location Report with Survey

* Well location change requires new plat. A substantive surface location change may require new Form 2A.

SURFACE LOCATION GPS DATA Data must be provided for Change of Surface Location and As Built Reports.

Latitude _____ PDOP Reading _____ Date of Measurement _____
 Longitude _____ GPS Instrument Operator's Name _____

LOCATION CHANGE (all measurements in Feet)

Well will be: _____ (Vertical, Directional, Horizontal)

Change of **Surface** Footage **From** Exterior Section Lines:

Change of **Surface** Footage **To** Exterior Section Lines:

Current **Surface** Location **From** QtrQtr NWNE Sec 25 Twp 1S Range 98W Meridian 6

New **Surface** Location **To** QtrQtr _____ Sec _____ Twp _____ Range _____ Meridian _____

Change of **Top of Productive Zone** Footage **From** Exterior Section Lines:

Change of **Top of Productive Zone** Footage **To** Exterior Section Lines: **

Current **Top of Productive Zone** Location **From** Sec _____ Twp _____ Range _____

New **Top of Productive Zone** Location **To** Sec _____ Twp _____ Range _____

Change of **Bottomhole** Footage **From** Exterior Section Lines:

Change of **Bottomhole** Footage **To** Exterior Section Lines: **

Current **Bottomhole** Location Sec _____ Twp _____ Range _____ ** attach deviated drilling plan

New **Bottomhole** Location Sec _____ Twp _____ Range _____

Is location in High Density Area? _____

Distance, in feet, to nearest building _____, public road: _____, above ground utility: _____, railroad: _____,

property line: _____, lease line: _____, well in same formation: _____

Ground Elevation _____ feet Surface owner consultation date _____

OTHER CHANGES

REMOVE FROM SURFACE BOND Signed surface use agreement is a required attachment

CHANGE OF WELL, FACILITY OR OIL & GAS LOCATION NAME OR NUMBER

From: Name NE RYAN GULCH WTR RECYCLING PIT Number _____ Effective Date: _____

To: Name _____ Number _____

ABANDON PERMIT: Permit can only be abandoned if the permitted operation has NOT been conducted. Field inspection will be conducted to verify site status.

WELL: Abandon Application for Permit-to-Drill (Form2) – Well API Number _____ has not been drilled.

PIT: Abandon Earthen Pit Permit (Form 15) – COGCC Pit Facility ID Number _____ has not been constructed (Permitted and constructed pit requires closure per Rule 905)

CENTRALIZED E&P WASTE MANAGEMENT FACILITY: Abandon Centralized E&P Waste Management Facility Permit (Form 28) – Facility ID Number _____ has not been constructed (Constructed facility requires closure per Rule 908)

OIL & GAS LOCATION ID Number: _____

Abandon Oil & Gas Location Assessment (Form 2A) – Location has not been constructed and site will not be used in the future.

Keep Oil & Gas Location Assessment (Form 2A) active until expiration date. This site will be used in the future.

Surface disturbance from Oil and Gas Operations must be reclaimed per Rule 1003 and Rule 1004.

REQUEST FOR CONFIDENTIAL STATUS

DIGITAL WELL LOG UPLOAD

DOCUMENTS SUBMITTED Purpose of Submission: _____

RECLAMATION

INTERIM RECLAMATION

Interim Reclamation will commence approximately _____

Per Rule 1003.e.(3) operator shall submit Sundry Notice reporting interim reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Interim reclamation complete, site ready for inspection.

Per Rule 1003.e(3) describe interim reclamation procedure in Comments below or provide as an attachment and attach required location photographs.

Field inspection will be conducted to document Rule 1003.e. compliance

FINAL RECLAMATION

Final Reclamation will commence approximately _____

Per Rule 1004.c.(4) operator shall submit Sundry Notice reporting final reclamation is complete and site is ready for inspection when vegetation reaches 80% coverage.

Final reclamation complete, site ready for inspection. Per Rule 1004.c(4) describe final reclamation procedure in Comments below or provide as an attachment.

Field inspection will be conducted to document Rule 1004.c. compliance

Comments:

ENGINEERING AND ENVIRONMENTAL WORK

NOTICE OF CONTINUED TEMPORARILY ABANDONED STATUS

Indicate why the well is temporarily abandoned and describe future plans for utilization in the COMMENTS box below or provide as an attachment, as required by Rule 319.b.(3).

Date well temporarily abandoned _____ Has Production Equipment been removed from site? _____

Mechanical Integrity Test (MIT) required if shut in longer than 2 years. Date of last MIT _____

SPUD DATE: _____

TECHNICAL ENGINEERING AND ENVIRONMENTAL WORK

Details of work must be described in full in the COMMENTS below or provided as an attachment.

NOTICE OF INTENT Approximate Start Date 06/30/2017

REPORT OF WORK DONE Date Work Completed _____

- Intent to Recomplete (Form 2 also required)
- Request to Vent or Flare
- E&P Waste Mangement Plan
- Change Drilling Plan
- Repair Well
- Beneficial Reuse of E&P Waste
- Gross Interval Change
- Rule 502 variance requested. Must provide detailed info regarding request.
- Other _____
- Status Update/Change of Remediation Plans for Spills and Releases

COMMENTS:

Per the original Form 15 COAs: "Operator has indicated that this facility may be in operation from 3 to 5 years. Should the operation of this facility continue more than three years, a Form 28 shall be submitted and approved prior to the expiration of the Form 2A and Form 15." To comply with this COA, this variance request is being submitted to request relief from this specific COA. The reasons for this variance request and the need to continue operating this facility are explained below.

The NE Ryan Gulch Water Recycling Pit was first put into service on June 30, 2014. According to Rule 902(e), use of this multi well pit would expire 3 years after the date of first use, or June 30, 2017, unless a variance from that date is granted by the Director. Therefore, according to Rule 502(b)(1), TEP respectfully requests a variance from the scheduled expiration / closure date of June 30, 2017. TEP is requesting permission from COGCC to continue use and operations of this pit for an additional three months (until October 1, 2017).

Due to on-going and future development needs in the Ryan Gulch area, it is proposed to convert this pit to a long-term produced water storage facility. A Form 28 application document is currently being prepared, and will be submitted to COGCC by August 1, 2017. Extending the operational date for the pit will allow for continued operations of the pit until the Form 28 can be completed, submitted to COGCC, and hopefully approved by October 1, 2017. Specific uses and needs for this pit are discussed in greater deatail in the "Operators Comments" section on the "Submit" tab of this request.

H2S REPORTING

Data Fields in this section are intended to document Sample and Location Data associated with the collection of a Gas Sample that is submitted for Laboratory Analysis.

Gas Analysis Report must be attached.

H2S Concentration: _____ in ppm (parts per million) Date of Measurement or Sample Collection _____

Description of Sample Point:

Absolute Open Flow Potential _____ in CFPD (cubic feet per day)

Description of Release Potential and Duration (If flow is not open to the atmosphere, identify the duration in which the container or pipeline would likely be opened for servicing operations.):

Distance to nearest occupied residence, school, church, park, school bus stop, place of business, or other areas where the public could reasonably be expected to frequent: _____

Distance to nearest Federal, State, County, or municipal road or highway owned and principally maintained for public use: _____

COMMENTS:

Best Management Practices

No BMP/COA Type

Description

Operator Comments:

TEP is requesting a variance be granted according to Rule 502(b) that would allow continued operation of the NE Ryan Gulch Water Recycling Pit until October 1, 2017. Further, TEP intends to submit a Form 28 that would allow the facility to be converted from a 3-year multi-well pit to an extended use, long-term water storage facility for the following reasons:

1. The NE Ryan Gulch Pit is critical to support planned re-completion activities that will occur in this area over the next several years. TEP has an aggressive re-completions schedule for the Ryan Gulch area, and this pit provides critical water storage capacity that will be needed for these re-completion activities.
2. It is very probable that new drilling activity will occur in the Ryan Gulch area within the next few years. Again, water storage capacity will be essential to supporting upcoming drilling activities.
3. TEP is proposing to participate in a Water Sharing Agreement with another operator in the NE Ryan Gulch area. This pit will play an essential role in the execution of water sharing activities in the Ryan Gulch area. Water sharing is a beneficial re-use of water resources and conserves / minimizes the amount of fresh water that would otherwise be needed to support development activities in this area.
4. This storage facility is critical to supporting TEP's day-to-day water management operations and balancing water needs throughout the service area. If the NE Ryan Gulch pit is closed, excess water will need to be trucked for off-site disposal which will result in increased truck traffic on local roads. Increased truck traffic has potential negative impacts upon public safety on road ways, increased fugitive dust emissions, and increased collisions with wildlife.
5. The NE Ryan Gulch Pit is an existing facility and is connected to existing infrasturce. There will be little or no new environmental disturbance required to continue operation of this pit.
6. Operational History: There is no history or pattern of upsets, corrective actions, or spills related to the operation of this facility since it was put into service.
7. Construction Details: The NE Ryan Gulch pit has a double liner sytem (60 mil HDPE primary liner and 40 mil HDPE secondary liner), has leak detection system, is netted, perimeter fencing, and monitoring wells.
8. Quarterly sampling of the two monitoring wells at this facility has been performed since October 2014. MW-1 has always been dry, and therefore, no samples have been collected. MW-2 showed water for a 5-month period in 2016, but has since dried up. Water quality samples were collected from this monitoring well during that period, however, the resulting data do not match the water chemistry of the produced water stored in the pit. TEP's independent consultant has concluded that the water that was temporarily observed in the MW-2 well is unrelated to the water in the pit, and was likely attributed to very localized fluctuation in the water table. The most recent data summary report and supporting documentation are included as attachments to this request. As shown in the attached water quality data summary, there is very poor correlation between any of the key parameters (e.g., inorganics, dissolved metals, TPH/BETX, etc.) observed in water samples collected from MW-2 and the produced water in the pit. Both monitoring wells were checked again on June 20, 2017, and were again found to be dry, and no samples could be collected. Quarterly monitoring will continue.
9. The NE Ryan Gulch Pit is not located in a sensitive area, nor is it located in any surface- or ground-water resource supply area.
10. The NE Ryan Gulch Pit serves as an operational "safety net" for water storage needs. In the event of an operational emergency, water may be diverted to/from this facility as needed.

PLEASE ROUTE THIS FORM 4 DIRECTLY TO THE ATTENTION OF ALEX FISCHER

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____

Print Name: Michael Gardner _____

Title: Environmental Services _____

Email: mgardner@terraep.com _____

Date: _____

Based on the information provided herein, this Sundry Notice (Form 4) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved:

Date:

CONDITIONS OF APPROVAL, IF ANY:

COA Type

Description

<u>COA Type</u>	<u>Description</u>

General Comments

User Group

Comment

Comment Date

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)

Attachment Check List

Att Doc Num

Name

<u>Att Doc Num</u>	<u>Name</u>
401317028	ANALYTICAL RESULTS

Total Attach: 1 Files