

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402449545

Date Received:
07/27/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

5 of 5 CAs from the FIR responded to on this Form

5 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 96850
Name of Operator: TEP ROCKY MOUNTAIN LLC
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

Contact Name and Telephone:
Name: _____
Phone: () _____ Fax: () _____
Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Byers, Jim</u>		<u>jbyers@blm.gov</u>
<u>.TEP</u>		<u>COGCCInspectionReports@terraep.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 696201365
Inspection Date: 06/05/2020 FIR Submit Date: 06/10/2020 FIR Status: _____

Inspected Operator Information:

Company Name: TEP ROCKY MOUNTAIN LLC Company Number: 96850
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

LOCATION - Location ID: 475753

Location Name: FEDERAL Number: PA 31-26 County: _____
Qtrqtr: LOT 2 Sec: 26 Twp: 6S Range: 95W Meridian: 6
Latitude: 39.499942 Longitude: -107.964151

FACILITY - API Number: 05-045-00 Facility ID: 475753

Facility Name: FEDERAL Number: PA 31-26
Qtrqtr: LOT 2 Sec: 26 Twp: 6S Range: 95W Meridian: 6
Latitude: 39.499942 Longitude: -107.964151

CORRECTIVE ACTIONS:

1 CA# 139638

Corrective Action: Comply with 603.f Date: 06/25/2020

Response: CA COMPLETED Date of Completion: 06/25/2020

Operator Comment: The trees / slash were saved per a request from Jim Byers (BLM) for use to mitigate the visual survey that was completed for this location. Per BLM's request, the materials were to be placed on the cut and fill slopes of the road and pad.

Update: A sign was placed at the northern edge of the slash pile. See attached photo.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

2 CA# 139639

Corrective Action: Install or repair required BMPs to stabilize slopes/soils per Rule and 1002.c and 1002.f.(2)C

Date: 06/25/2020

Response: CA COMPLETED

Date of Completion: 06/25/2020

Operator Comment: All cut and fill slopes associated with the pad and access road have been stabilized (hydroseeded) per on-site meeting with COGCC and BLM personnel. See attached photos.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

3 CA# 139640

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 06/25/2020

Response: CA COMPLETED

Date of Completion: 06/25/2020

Operator Comment: This CA was approved by COGG on initial FIRR.

COGCC Decision: Approved pending re-inspection

COGCC Representative: CA was "Approved pending re-inspection" within FIRR #402425497, this was not a conditional approval passing the corrective action.
A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

4 CA# 139641

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 06/25/2020

Response: CA COMPLETED

Date of Completion: 06/25/2020

Operator Comment: The low water crossing was an approved component of the design for this pad and was approved by BLM. Storm water and sediment controls have been implemented and include: 1) Hydroseeding / stabilizing disturbed surfaces adjacent to low water crossing. 2) Installation of anchored wattles below hydroseeded slopes to intercept sediment before entering dry stream channel. 3) Sediment traps and anchored wattles extending across entire width of channel of dry wash to collect any additional sediment that may make it through the upstream BMPs. 4) Temporary frac lines have been sleeved / protected with poly pipe. See attached photos of low water crossing and associated BMPs.

This low water crossing is an allowed / permitted feature of the design to access this location and appropriate BMPs have been installed to protect the crossing and minimize the amount of sediment potentially released to the dry stream channel. This location will be inspected every 2 weeks at a minimum, and repairs will be made as needed.

COGCC Decision: **Not Approved**

COGCC Representative: As stated within Resolution Form #402425497, stormwater issues, including the water crossing, was reviewed with the CDPHE and it was apparent that several violations were present for both COGCC and the CDPHE.
Corrective actions identified in the previous inspections remain applicable and Location will remain out of compliance until addressed.

5 CA# 139642

Corrective Action: Operator shall submit documentation attached to a Form 4 Sundry with information detailing 1) The topsoil depth of the Location prior to soil salvage and segregation, 2) The amount of soil that was salvaged and stored.

Date: 06/17/2020

Response: CA COMPLETED

Date of Completion: 06/25/2020

Operator Comment: This information has already been documented by TEP as required by Rule 1002.b.(2), and was previously provided on the construction layout plat package that already been submitted to, and approved by COGCC. TEP personnel will discuss this item further with COGCC at a site meeting that has been scheduled for June 23, 2020 at 10:45 am.

Update to above information: TEP has re-surveyed the pad perimeter and the top soil stockpile volume and location. An updated survey plat showing the topsoil stockpile volume and storage location is attached, and will also be submitted on a Form 4. As shown on this as-built survey plat, the topsoil stockpile is 1,890 CY. The topsoil volume listed on the plan was 2,040 CY. Based upon the reduction in surface disturbance as a result of changes made during construction, there were two areas that were NOT stripped of topsoil. These areas roughly make up the difference between the planned and actual volumes.

It should be noted that the topsoil at this location is extremely thin to non-existent (6-inches or less) in certain locations, and per COGCC Rule 1002.b.(3), TEP has segregated and stockpiled available topsoils " ... to the extent possible..." and has stored and protected these topsoils responsibly. A "Topsoil Stockpile" sign has been installed at the base of the topsoil stockpile. See attached photo.

COGCC Decision: Approved

COGCC Representative: Calculations have been provided.

OPERATOR COMMENT AND SUBMITTAL

Comment: These additional comments are being provided as an update to the original FIRR document number 402425497.

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

Print Name: Michael Gardner

Signed: _____

Title: TEP Environmental

Date: 7/27/2020 3:27:54 PM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
402449545	FIR RESOLUTION SUBMITTED
402450141	PA 31-26 slash stockpile sign
402450142	PA 31-26 mulched cut slope
402450143	PA 31-26 mulched fill slope
402450144	PA 31-26 low water crossing permitted by BLM
402450145	PA 31-26 functioning BMPs in channel below LW xing
402450146	PA 31-26 mulched top soil stockpile
402450147	PA 31-26 top soil stock pile sign
402450170	COGCC Rule 1002.b.(3)
402453711	PA 31-26 as-built plat with topsoil stockpile volume

Total Attach: 10 Files