

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402589971

Date Received:  
02/03/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

1 of 1 CAs from the FIR responded to on this Form

1 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>Kellerby, Shaun</u>		<u>shaun.kellerby@state.co.us</u>
<u>Michael Gardner</u>	<u>970-623-4875</u>	<u>mgardner@terraep.com</u>
<u>Inspection, Terra TEP</u>	<u>970-285-9377</u>	<u>COGCCInspectionReports@terraep.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 701101104  
Inspection Date: 01/28/2021 FIR Submit Date: 01/29/2021 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: 334773

Location Name: UNOCAL-66S96W Number: 35SWSW County: \_\_\_\_\_  
Qtrqr: SWS Sec: 35 Twp: 6S Range: 96W Meridian: 6  
W  
Latitude: 39.475590 Longitude: -108.083480

FACILITY - API Number: 05-045-00 Facility ID: 334773

Facility Name: UNOCAL-66S96W Number: 35SWSW  
Qtrqr: SWS Sec: 35 Twp: 6S Range: 96W Meridian: 6  
W  
Latitude: 39.475590 Longitude: -108.083480

CORRECTIVE ACTIONS:

1 CA# 146156

Corrective Action: Install, maintain or provide documentation of post construction management plan or BMP's

Date: 02/12/2021

Response: CA COMPLETED

Date of Completion: 02/03/2021

Operator Comment: TEP maintains and implements BMPs per our post-construction storm water management Best Management Practices (BMP) manual (see attached). The BMP manual and individual BMPs have been developed in accordance with good engineering practices. Sediment is migrating from the hills and steep topography adjacent to CR 215 and, due to insufficient maintenance of this county road (i.e., culverts and barrow ditches not being maintained) by the County. As a result, sediment from the adjacent terrain is naturally washed along and across CR 215. Existing culverts and barrow ditches along CR 215 are simply not sufficiently maintained by the County. TEP makes every attempt to maintain sediment controls where oil and gas access roads enter/exit CR 215. These activities include keeping sufficient gravel cover at exit/entrance points to minimize tracking, scraping / blading / sweeping sediment from exit / entrance points, installing other miscellaneous BMPs (e.g., sediment traps, water bars, etc.) to direct sediment / runoff water away from the county road. By and large, the majority of sediment that is washing across and along CR 215 is coming from non-disturbed, natural terrain, and is the result of inadequate maintenance of the county road.

COGCC Decision: \_\_\_\_\_

COGCC Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: During mud season, when vehicles drive on soft, muddy roads, ruts will usually occur. TEP continually grades, blades, and maintains dirt roads to remove and fill-in ruts, and to ensure that roads are kept in good usable condition to sustain on-going operations. Maintaining dirt roads can only occur after the roads have dried out sufficiently to allow for the soils to be bladed. Road maintenance is a continual, on-going, year-round process. The access road shown in this inspection report has been maintained to minimize the amount of sediment tracked off of the road, and to minimize sediment being transported by storm water runoff from entering CR 215. This maintenance will continue to occur as soils begin to thaw and/or additional storms bring additional precipitation to the area. This corrective action has been addressed.

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: 2/3/2021 9:41:59 AM

**ATTACHMENT LIST**

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

<b><u>Document Number</u></b>	<b><u>Description</u></b>
402590046	TEP Storm Water BMP Manual

Total Attach: 1 Files