

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402763928

Date Received:  
07/30/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

2 of 2 CAs from the FIR responded to on this Form

2 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
TEP		COGCCInspectionReports@terraep.com
Kellerby, Shaun		shaun.kellerby@state.co.us

COGCC INSPECTION SUMMARY:

FIR Document Number: 699803442  
Inspection Date: 07/22/2021 FIR Submit Date: 07/22/2021 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: 335189

Location Name: FEDERAL-66S96W Number: 36NWNW County:  
Qtrqr: NWN Sec: 36 Twp: 6S Range: 96W Meridian: 6  
W  
Latitude: 39.486226 Longitude: -108.064877

FACILITY - API Number: 05-045-00 Facility ID: 335189

Facility Name: FEDERAL-66S96W Number: 36NWNW  
Qtrqr: NWN Sec: 36 Twp: 6S Range: 96W Meridian: 6  
W  
Latitude: 39.486226 Longitude: -108.064877

CORRECTIVE ACTIONS:

1  CA# 154195

Corrective Action: Provide written remediation plan to repair damaged BMP's and sediment migration. Date: 07/29/2021

Response: CA COMPLETED Date of Completion: 07/29/2021

Operator Comment: An intense rain event occurred in the area of the GM 11-36 location on July 14, 2021. As a result of this intense storm event, a flash flood originated in the canyons and drainages above the GM 11-36 location, and significant volumes of rock, sediment, and debris were scoured from the areas above the location and flowed down the drainage area that is adjacent to the GM 11-36 location. The flood and debris was mostly contained to the

channel of the canyon bottom and bypassed the GM 11-36 pad except where a small volume of water in the channel over-topped the banks above the location and deposited a small amount of mud and water on the location itself. No equipment on the pad was damaged, and any on-site BMPs that were impacted will be repaired per TEP existing written plans: 1) Construction Field-Wide Storm Water Management Plan (SWMP), and 2) Piceance Basin Storm Water Manual of Best Management Practices (BMPs). These documents have been prepared and implemented in accordance with good engineering practices and are designed to prevent sediment migration and site degradation under normal rainfall conditions (25-year, 24-hour storm events). Based upon current site conditions (and assuming additional, damaging storm events do not occur during the interim), repairs to the storm water BMPs at this location will be completed by August 31, 2021.

It is important to note that the sediment, rock, and debris that flowed down the main drainage located west of the GM 11-36 pad, came from the drainage basin and areas located above (north) of the GM 11-36 pad. These materials were scoured from the steep slopes and surfaces within the drainage basins above the GM 11-36 location. The flash flood and debris flowed around and below the GM 11-36 pad and were ultimately deposited in the canyon and low lying areas below the GM 11-36 pad. This is evidenced by the fact that the GM 11-36 pad is still intact. The GM 11-36 pad itself, held up very well to this intense storm event.

COGCC Decision: Approved pending re-inspection

COGCC  
Representative:

2  CA# 154196

Corrective Action: Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations.

Date: 08/06/2021

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: TEP will repair any damaged storm water BMPs at this location in accordance with TEP's existing, written plans: 1) Construction Field-Wide Storm Water Management Plan (SWMP), and 2) Piceance Basin Storm Water Manual of Best Management Practices (BMPs). Together these documents provide written procedures that describe how BMPs will be implemented at each location to minimize erosion, transport of sediment off-site, and site degradation.

TEP will install a gravel tracking pad as an additional BMP at the entrance to the pad in an attempt to minimize off-site tracking of sediment from the pad onto the access road. Installation of the gravel tracking pad and repair of any BMPs damaged by recent storm events will be completed by August 31, 2021.

COGCC Decision: Approved pending re-inspection

COGCC  
Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: All corrective actions have been addressed. Any BMPs damaged by recent storm events will be repaired and re-installed as needed by August 31, 2021. Repairs will be performed per TEP's written plans and procedures (covers attached).

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 ENV

Date: 7/30/2021 9:16:42 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>
402763928	FIR RESOLUTION SUBMITTED
402763930	TEP SWMP - cover
402763932	TEP BMP Installation Manual - cover
402765433	View of flood impacted area above GM 11-36

Total Attach: 4 Files