

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402885682

Date Received:  
12/02/2021

## 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: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

Email: \_\_\_\_\_

Additional Operator Contact:

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.TEP

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Fischer, Alex

alex.fischer@state.co.us

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### COGCC INSPECTION SUMMARY:

FIR Document Number: 696203369

Inspection Date: 11/19/2021

FIR Submit Date: 11/19/2021

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: 480732

Location Name: FEDERAL Number: WMC 24-17 County: \_\_\_\_\_

Qtrqtr: SESW Sec: 17 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.439076 Longitude: -107.799611

### FACILITY - API Number: 05-045- -00 Facility ID: 480732

Facility Name: FEDERAL Number: WMC 24-17

Qtrqtr: SESW Sec: 17 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.439076 Longitude: -107.799611

### CORRECTIVE ACTIONS:

1 ☒ CA# 158011

Corrective Action:

Date: 11/16/2021

Corrective action from FIR #696203364 requiring the removal and proper disposal of the cement returns within the Cuttings Trench remains applicable.

In addition to the removal requirements, COGCC is also requiring Operator to submit documentation of removal; including date stamped photo documentation showing cement waste has been removed from the cuttings trench, and the waste manifests to document proper disposal of the E&P wastes at an approved Facility.

Response: CA COMPLETED

Date of Completion: 12/02/2021

Operator  
Comment:

TEP Offers the following comments in response to this Corrective Action:

- 1) TEP uses a specifically engineered cement designed for downhole wellbore applications and to remain in compliance with the rules under section 408. Field Inspection Report #696203369 (dated 11/16/2021) states that these cement returns cannot be homogenously mixed and incorrectly refers to the returns as concrete. The hardened cement returns are easily pulverized and blended during the reclamation process. Attempting to haul circulated excess cement elsewhere during live drilling operations would unnecessarily risk the operation by reducing our flexibility to manage inconsistent returns leading to poorer cement jobs, well control and safety issues, bradenhead pressure issues, and well integrity issues because we did not achieve the desired top of cement. This would inhibit our ability to remain in compliance with Rule 408.h which states "the Operator will clean and condition the wellbore to control gas flow, foster adequate cement displacement, and ensure a bond between cement, casing, and the wellbore."
- 2) Cement is not an environmental hazard nor referenced in the 900 series rules. It is used as a barrier to protect groundwater and it isolates non-hydrocarbon bearing zones from hydrocarbon bearing zones. Circulating excess cement to surface ensures we have properly isolated all formations behind our surface casing, and for conductors, cement to surface ensures we have a solid foundation that properly supports the weight of the inner casing strings. TEP will not cut back on cement excess as we would be in violation of Rule 408.i.(2) which requires that the operator "cement all surface casing with a continuous column from the bottom of the casing to the surface." In summary, cutting excess cement so that it does not return to surface, would only increase the risk of not having good wellbore integrity and lead us to be out of compliance with the operating rules in section 408.
- 3) Photo 12 in the original photo log (doc #696203366) is a picture of actual rock core that was removed from the wellbore (i.e., cuttings) when conductors were set. This rock core is mistakenly identified in the photo log as "concrete/cement waste/debris."
- 4) Cement at the bottom of the conductor is drilled out during the surface drilling phase and circulated to surface as drill cuttings along with formation. Cement at the bottom of surface casing (i.e., in the "shoe track") is drilled out during the production drilling phase and circulated to surface with formation material as drill cuttings.

COGCC Decision: **Not Approved**

COGCC  
Representative:

At time of inspection, unclear that cores are rock.

COGCC does not consider cement as cuttings, but rather as "cement", and the Cuttings Trench is permitted for dried cuttings, and no other E&P waste. Cement needs to be removed and properly disposed of, and waste manifests provided per the corrective action.

COGCC has no intention on commenting on TEP's cementing process; CA only has to do with removal of Cement (E&P Waste).

COGCC  
Supervisor:

At time of inspection, unclear that cores are rock.

COGCC does not consider cement as cuttings, but rather as "cement", and the Cuttings Trench is permitted for dried cuttings, and no other E&P waste. Cement needs to be removed and properly disposed of, and waste manifests provided per the corrective action.

COGCC has no intention on commenting on TEP's cementing process; CA only has to do with removal of Cement (E&P Waste).

#### OPERATOR COMMENT AND SUBMITTAL

Comment: Comments to Corrective Action #158011 have been provided herein. As discussed with John Heil on November 29, 2021, TEP would welcome the opportunity to meet with COGCC (Engineering, Reclamation, and Environmental) staff to discuss and clarify this issue.

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: 12/2/2021 3:06:32 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>
402885682	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files