

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402939714

Date Received:
01/27/2022

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

2 of 3 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: 1058 COUNTY ROAD 215
City: PARACHUTE State: CO Zip: 81635

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

Additional Operator Contact:

Contact Name	Phone	Email
<u>TEP</u>		<u>COGCCInspectionReports@terraep.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 696203193
Inspection Date: 10/08/2021 FIR Submit Date: 10/11/2021 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: 439173

Location Name: Youberg RU Number: 44-7 County: _____
Qtrqr: SESE Sec: 7 Twp: 7S Range: 93W Meridian: 6
Latitude: 39.454841 Longitude: -107.810805

FACILITY - API Number: 05-045-00 Facility ID: 439173

Facility Name: Youberg RU Number: 44-7
Qtrqr: SESE Sec: 7 Twp: 7S Range: 93W Meridian: 6
Latitude: 39.454841 Longitude: -107.810805

CORRECTIVE ACTIONS:

2 CA# 156673

Corrective Action: Install sign to comply with Rule 605 rules Date: 11/12/2021

Response: CA COMPLETED Date of Completion: 10/14/2021

Operator Comment: Sign has been installed at the entrance to location

COGCC Decision: Approved

Approved via FIR 696203318

COGCC
Representative:

3 CA# 156674

Corrective Action: Comply with Rule 1002.f

Date: 10/19/2021

Response: CA COMPLETED

Date of Completion: 10/19/2021

Operator
Comment:

1) "Sediment traps on location not constructed or maintained in proper functioning condition." TEP response: The slope drains in sediment traps have been purposefully blocked / closed while frac operations are being conducted from this location. This action is a deliberate Spill Prevention BMP that is needed during fraccing operations. Otherwise an open slope drain would become an open conduit that could potentially result in an uncontrolled, release of fluids off the location in the event that a major spill or release were to occur during fraccing operations. This BMP complies with COGCC Rule 1002.f.(3).(A) which states that post-construction BMPs shall be selected to address potential sources of pollution which may reasonably be expected to affect the quality of discharges associated with ongoing operations. Once frac operations have been completed at this location, the slope drains will be opened and the sediment traps will again be returned to functioning as a sediment control BMP. Additionally, COAs for the Drilling / Completions Operations (Form 2A document number 401058467) requires that TEP implement best management practices to contain any unintentional release of fluids. Temporarily blocking slope drains during completions operations is a long-standing BMP that has been used to minimize the potential for off-site impacts in the event of an accidental release.

2) "Control measures to stabilize / protect cut slopes of the location missing or insufficient." TEP Response: The exposed cut slope at the RU 44-7 is composed mostly of large basaltic rock and boulders (up to 80% rock). Therefore, the cut-slope is naturally stabilized and is "rip-rapped" / hardened against erosion. See attached photos. This location has been stabilized for several years and has not experienced any issues with instability of the cut slope. Attempting to hydro-mulch / seed this slope would be futile, due to the high content of rock in the slope. Further, erosion control blankets would likewise have little affect or add negligible benefit to stabilizing the slope. The cut slope and any stability issues will be addressed during the final reclaim of the location when the site will be reclaimed back to pre-existing conditions and contours.

In summary, this Drill Pad Location was permitted and approved for construction at this location by COGCC. In compliance with Rule 1002.d, the steep cut slope associated with this Drill Pad Location was constructed to the least percent slope practical, and the steep cut slope at this permitted location was not avoidable. Due to the high content of naturally-occurring rock within the cut slope, TEP believes that the cut-slope at this location is stable. Further, the BMPs implemented at this location comply with Rule 1002.f.(2) and are designed to minimize (not eliminate) erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004.

COGCC Decision: **Not Approved**

COGCC
Representative:

After conversations with Field Staff and Operator, approving portion of CA regarding the sediment traps; once frac Operations have been completed, trap and slope drain control measures require maintenance to ensure BMPs are installed in accordance with good engineering practices, and maintained in proper functioning condition.

Operator CA date of completion 10/19/2021, FIR #696203424 dated 12/7/2021 observed that control measures to minimize erosion, stabilize/protect cut slopes of the Location are missing or insufficient. COGCC Decision "Not Approved", CA remains applicable.

OPERATOR COMMENT AND SUBMITTAL

Comment: Corrective actions # 156673 and #156674 have 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 ENV

Date: 1/27/2022 4:19:10 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>
402939714	FIR RESOLUTION SUBMITTED

Total Attach: 1 Files