

Mike Gardner

Subject: FW: COGCC Rule 1002.f.2.(F): Vehicle Tracking Control Practices

COGCC Rule 1002.f.2.(F) states: “Vehicle tracking control practices to control potential sediment discharges from operational roads, well pads, and other unpaved surfaces. Practices **could include** road and pad design and maintenance **to minimize rutting and tracking**, controlling site access, street sweeping or scraping, tracking pads, wash racks, education, or other sediment controls.”

In compliance with this rule, TEP employs numerous sediment controls including pad design elements, controlling site access, educating and training employees (and contractors) to not travel on roads / pads during extremely wet and muddy conditions, posting signage prohibiting vehicle traffic during muddy conditions, performing routine road and pad maintenance, using road base and rock to harden surfaces, and blading / dragging ruts from roads and pads. All of these practices are implemented to **minimize rutting and vehicle tracking** which is what is required by Rule 1002.f.2.(F). This Rule does not mandate the use of tracking pads; rather a tracking pad is simply one of the options (tools) that could be used for controlling sediment. TEP does use tracking pads when / if it makes sense to do so.

Further, as stated in this rule, the purpose of these controls are to **minimize rutting and tracking**; NOT to completely eliminate rutting and tracking. This interpretation complies not only with the literal reading of this rule, but also with the intent of these requirements as found in COGCC’s Statement of Basis and Purpose which was used in the development of this Rule.

When muddy conditions are present (i.e., after a significant precipitation event, during snow-melt events, during Spring thaw conditions, etc.), well pad locations and access roads will be graded and ruts will be removed when site conditions dry out and improve. For grading and blading efforts to be successful, the soils cannot be too wet; otherwise, heavy equipment can cause even greater damage while attempting to grade roads and well pads. TEP relies upon the professional judgement and discretion of the Production Field Supervisors to make this determination when soil conditions are optimal to repair and maintain well pad surfaces and access roads.

In summary: In compliance with 1002.f.2.(F), TEP is attempting to minimize and control sediment to the greatest extent practical during muddy season conditions by: 1) Controlling site access; 2) Educating employees and contractors to minimize the amount of traffic during muddy conditions; 3) Strategically planning our routes and work activities to minimize traffic as much as possible during muddy conditions (e.g., accessing the most difficult locations during early morning hours when ground conditions are frozen, minimizing the number of vehicle trips in/out); 4) Using pad design considerations (i.e., constructing the pad to drain snow melt and precipitation away from high-traffic, active working areas of the pad) to minimize rutting and sediment tracking; 5) Installing and maintaining multiple BMPs to **control and minimize sediment tracking** to the greatest extent practicable; and 6) Routinely placing gravel / rock on pad surface and access roads to improve access, minimize ruts, and reduce fugitive dust emissions.

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