

## Mike Gardner

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**To:** COGCC Field Inspection Personnel  
**Subject:** Rule 606.a. - Prohibition of Storage, Placement, or Maintenance of Equipment, Vehicles, Trailers, and Other Materials Not Necessary for Use on an Oil and Gas Location

COGCC Rule 606.a states that “The storage, placement, or maintenance of equipment, vehicles, trailers, commercial products, Chemicals, drums, totes, containers, materials, and all other supplies not necessary for use on an Oil and Gas Locations is prohibited.” Rule 606.a.(1) further states that “This prohibition applies to the Operator and all contractors.” The prohibition regarding equipment, vehicles, materials, etc. not necessary for use on an Oil and Gas location **does not** apply to land owners. As Rule 606.a.(1) is written, TEP is in full compliance with this Rule. All of the equipment **owned by TEP** at the subject location, is necessary for the safe and compliant operation of our oil and gas facilities.

Because the prohibitions claimed by Rule 606.a.(1) clearly apply only to Operators and Contractors (not land owners), any other equipment, materials, supplies, vehicles etc., that are the personal property of the land owner, are the responsibility of the land owner, and not that of TEP.

From an operational and site-safety standpoint, the equipment or materials stored by the land owner at this location do not interfere with TEP’s ability to safely conduct day-to-day operations at this location, nor will the items interfere with access / egress by emergency response vehicles if needed. Therefore, COGCC staff should contact the land owner directly to resolve any State issues regarding the storage or placement of personal property belonging to the land owner at the subject location.