

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402988462

Date Received:
03/18/2022

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

5 of 5 CAs from the FIR responded to on this Form

5 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>Byers, Jim</u>		<u>jbyers@blm.gov</u>
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<u>De Paolo, Corey</u>		<u>corey.depaolo@state.co.us</u>
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COGCC INSPECTION SUMMARY:

FIR Document Number: 696203469
Inspection Date: 03/09/2022 FIR Submit Date: 03/11/2022 FIR Status: _____

Inspected Operator Information:

Company Name: TEP ROCKY MOUNTAIN LLC Company Number: 96850
Address: 1058 COUNTY ROAD 215
City: PARACHUTE State: CO Zip: 81635

LOCATION - Location ID: 335177

Location Name: DOE-66S96W Number: 36SWNE County: _____
Qtrqtr: SWNE Sec: 36 Twp: 6S Range: 96W Meridian: 6
Latitude: 39.482351 Longitude: -108.053591

FACILITY - API Number: 05-045-00 Facility ID: 335177

Facility Name: DOE-66S96W Number: 36SWNE
Qtrqtr: SWNE Sec: 36 Twp: 6S Range: 96W Meridian: 6
Latitude: 39.482351 Longitude: -108.053591

CORRECTIVE ACTIONS:

1 CA# 160099

Corrective Action: In the event that a spill/release is discovered, TEP shall contact COGCC EPS and comply with Rule 912 reporting requirements upon discovery.

Date: 06/01/2022

Any remediation of a spill/release will be required to be completed no later than 6/1/2022.

Response: CA COMPLETED

Date of Completion: 03/10/2022

Operator Comment: TEP investigated the location immediately upon being notified of a suspected leak by COGCC Reclamation Inspector Trujillo. TEP investigated the seep area of concern by physically walking down the side slope to inspect the seep, immediately conducting a new pressure test of dump /flow lines, and reviewing historical pressure testing data for the past two years. Recent and historical data indicate that the dump / flow lines are not leaking. A copy of historical pressure testing data is submitted as an attachment to this document. In addition, soil samples from the seep area below the pad were collected and submitted for full Table 915-1 analysis. The samples were submitted for expedited processing by the lab, but results have not yet been received.

At this time, based upon recent and historical pressure testing data, an investigation of the soils collected from the seep itself, and the presence of other numerous seeps in the immediate area (see attached photos), TEP does not believe that the seep is related to the operations or activities associated with the DOE 2-M-36 well pad. Based upon the information that is available, TEP believes that this is a natural seep that is recharged from annual snow melt and from localized storm events. TEP has monitored this seep for several years and it is observed to "dry up" after annual snow melt conditions subside. The source of the white staining observed around the seep area is natural alkali that is leached from the soils and is brought to the ground surface either through groundwater seeps, or as wet soils dry and the alkali salts are concentrated on the soil surface through capillary actions. There are several similar natural seeps that are highly visible from the DOE 2-M-36 pad that show similar conditions on the steep slopes immediately above this pad (see attached photos).

COGCC Decision: **Not Approved**

COGCC Representative: Unable to approve Resolution until all data has been received, including soil samples that investigate the Table 915 standards.

2 CA# 160100

Corrective Action: Comply with Rule 606

Date: 03/18/2022

Response: CA COMPLETED

Date of Completion: 03/17/2022

Operator Comment: The broken piece of the slope drain pipe has been removed.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

3 CA# 160101

Corrective Action: Conduct pressure testing to determine integrity of all dump lines and all flowlines, for all wells/associated wells on and off the Location. COGCC Integrity Staff required to be on Location to witness pressure test; pressure testing required within next two weeks.

Date: 03/25/2022

Submit pressure test data, as well as test data from the past two years attached to a Form 4 Sundry to both Western Integrity Inspector Richard Murray.

Response: CA COMPLETED

Date of Completion: 03/18/2022

Operator Comment: Pressure testing data showing the successful testing of dump / flow lines for the past two years has been submitted as an attachment to this document. TEP will coordinate with Richard Murray before 3/25/22 to conduct an additional pressure test that can be witnessed by Mr. Murray.

COGCC Decision: **Not Approved**

COGCC Representative: All pressure testing data from the past two (2) years (2020 AND 2021) has not been submitted on a Form 4 per the Corrective Action.

FIRR Submitted 3/18/2022; Date Operator states CA was completed 3/25/2022; COGCC can not accept "Corrective Action Completed" for future dates.

4 CA# 160102

Corrective Action: Ensure all anchors on Location are marked in accordance with Rule 1003.a Date: 03/26/2022

Response: CA COMPLETED Date of Completion: 03/18/2022

Operator Comment: Anchors have been marked or removed as required.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

5 CA# 160103

Corrective Action: Comply with 1002.f; Install or repair slope drain in accordance with good engineering practices; and implement temporary stormwater and erosion control measures on the southern slopes to minimize further degradation and sediment transport by 3/25/2022. Date: 06/01/2022

Repair and Reclamation of the degraded areas, and the installation/implementation of long term stormwater and erosion control measures will be required to be completed no later than 6/1/2022.

Response: CA COMPLETED Date of Completion: 03/18/2022

Operator Comment: The well pad has been recently bladed and graveled. The access road has also been graded to remove ruts. Even if the seep is proven to be from naturally occurring ground water, TEP will closely monitor the slope and any further encroachment towards the pad and equipment. TEP has been monitoring this are for several years and there has been no recent change or threat to the location. However, if it is determined that the slope is presenting an undue risk to the pad and equipment, the production equipment will be re-located to a different portion of the pad away from the slope.

COGCC Decision: **Not Approved**

COGCC Representative: Corrective action required Operator to address slope drain BMP, and to implement BMPs to address stabilization issues on the slope. Based on Operator comments corrective action has not been completed.

OPERATOR COMMENT AND SUBMITTAL

Comment: Corrective actions have been addressed / completed.

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 Lead

Date: 3/18/2022 9:22:30 AM

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>
402988462	FIR RESOLUTION SUBMITTED
402988527	Pressure test data
402988550	Adjacent seeps above the DOE 2-M-36 pad
402988556	DOE 2-M-36 alkali area

Total Attach: 4 Files