

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number: 403136241 Date Received: 08/15/2022

EARTHEN PIT REPORT / PERMIT

This form is to be used for both reporting and permitting pits. Rule 908 describes when a Permit with prior approval, or a Report within 30 days is required for pits. Submit required attachments and forms.

Form Type: [X] PERMIT [ ] REPORT

OGCC PIT NUMBER: 482867

NOTE: Operator to provide OGCC Pit Number only if available on an existing pit for pit report

OGCC Operator Number: 96850 Contact Name: Michael Gardner
Name of Operator: TEP ROCKY MOUNTAIN LLC
Address: 1058 COUNTY ROAD 215 Phone: (970) 623-4875
City: PARACHUTE State: CO Zip: 81635 Email: mgardner@terraep.com

Pit Location Information

Operator's Pit/Facility Name: RG 41-18-297 Drill Cuttings Trench Operator's Pit/Facility Number:
API Number (associated well): 05- 00
OGCC Location ID (associated location): 316591 Or Form 2A # 402342785
Pit Location (QtrQtr, Sec, Twp, Rng, Meridian): NWNE-18-2S-97W-6
Latitude: 39.881867 Longitude: -108.322667 County: RIO BLANCO

Operation Information

Construction Date: 09/30/2021 Actual or Planned: Planned Pit Type: Unlined
Per rule 405.c: Operators will provide the Commission written notice 2 business days in advance of a Pit liner installation at any facility.
Pit Use/Type (Check all that apply):
[X] Drilling: (Ancillary, Completion, Flowback, Reserve Pits) [ ] Oil-based Mud [ ] Salt Sections or High Chloride Mud
[ ] Production: [ ] Skimming/Settling [ ] Produced Water Storage [ ] Percolation [ ] Evaporation
[ ] Special Purpose: [ ] Flare [ ] Blowdown [ ] BS&W/Tank Bottoms
[ ] Multi-Well Pit: [ ] Check if Rule 909.g.(1-4) applies.
[X] Cuttings Trench
[ ] Form 15 Exception Pit Submitted within 30 Days after Constructing (908.c): [ ] Emergency [ ] Workover [ ] Plugging
Method of treatment prior to discharge into pit: De-watering
Offsite disposal of pit contents: [ ] Injection; [ ] Commercial; [X] Reuse/Recycle; [ ] NPDES; Permit Number:
Other Information:
The purpose of this drill cuttings trench is to receive drill cuttings from 17 new wells drilled at the Federal RG 41-18-297 well pad (COGCC Location ID 316591). The document number for the approved Form 2A for this development is 402342785. Drill cuttings will be treated (mixing, blending, amending) to meet COGCC 915-1 cleanup standards. Once the 915-1 standards have been met, the cuttings trench will be closed and reclaimed as described in the Form 2A (attached).

Site Conditions

Enter 5280 for distance greater than 1 mile.
Distance (in feet) to the nearest surface water: 454 Ground Water (depth): 500 Water Well: 4840
Distance (in feet) to nearest Building Unit: 5280
Distance (in feet) to nearest Designated Outside Activity Area: 5280

**Pit Design and Construction**

Size of Pit (in feet): Length: 103 Width: 100 Depth: 19 Calculated Working Volume (in barrels): 34624

Flow Rates (in bbl/day): Inflow: 2405 Outflow: \_\_\_\_\_ Evaporation: \_\_\_\_\_ Percolation: \_\_\_\_\_

Primary Liner. Type: Earthen pit Thickness (mil): 0

Operational Lifespan, per manufacturer's specs (years): 1000

Secondary Liner (if present): Type: none Thickness (mil): 0

Operational Lifespan, per manufacturer's specs (years): 1000

Is Pit Fenced? Yes Is Pit Netted? No Leak Detection? No

**Pit Emissions**

Attach Pit Emission Calculations.

Estimated tons per year (tpy) of volatile organic compounds (VOCs): 2 (Round to nearest whole ton.)

Other Information:

Air emissions from drill cuttings are considered to be "pre-production" phase, and are currently not regulated per CDPHE.

Operator  
Comments:

Please forward to John Heil.

There will be no off-site disposal of drill cutting trench contents. All drill cuttings will be treated to meet COGCC 915-1 clean up standards and will be disposed on-site. In compliance with Rule 911.a, a Form 27 will be submitted to document final closure of the RG 41-18-297 drill cuttings trench, and to convey sampling data that supports closure of the cuttings trench.

Under the Pit Design and Construction Information section, the "Calculated Working Volume" of the drill cuttings trench has been converted from cubic yards (7,200 cy) to barrels (~34,624 bbls). Similarly, the daily flow rate has been estimated / converted from cubic yards to barrels. Also, the "Operational Lifespan, per manufacturer's specs (years)" is a required value to complete this Form 15: however, it is not applicable to an earthen pit where there are no primary or secondary liners. Therefore, a default value of 1000 years was used.

**Certification**

Rule 909.e.(3): If an Operator allows oil or condensate (free product or sheen) to accumulate in a Pit, then the Director may revoke the Operator's Form 15 and require the Operator to close and remediate the Pit.

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: \_\_\_\_\_ Print Name: Michael Gardner  
Title: TEP Environmental Lead Email: mgardner@terraep.com Date: 08/15/2022

**Approval**

Signed:  Title: Director of COGCC Date: 09/08/2022

## Best Management Practices

<b>No</b>	<b>BMP/COA Type</b>	<b>Description</b>

CONDITIONS OF APPROVAL:

### Condition of Approval

<b>COA Type</b>	<b>Description</b>
	Operator shall provide the current status of Section 18 Water Recycling Pit ID 443360.
	A Form 27 was submitted under Location ID: 316591 (Doc #403119190) to close the cuttings trench. The Form 27 will be pushed to Draft so that the operator can submit appropriate cuttings pit closure documentation under the Pit Facility ID that will be generated on approval of this Form 15.
	Per Rule 913.b.(2).C. Composite sample results may be submitted for preliminary analysis and waste profiling. Discrete sample results will be required for confirmation sampling.
	The RG 41-18-297 Drill Cuttings Trench shall be closed with a Form 27 and discrete samples through the vertical profile of the cuttings from the surface of the cuttings to base of the trench shall be collected and analyzed for Table 915-1 Cleanup Concentrations. Based upon the Construction Plan Doc #403136395 it appears that the cuttings trench is 100' by 103' by 19' feet deep.
	Per the definition of Cuttings Trench, the depression shall be used specifically for the onsite storage and disposal of dried cuttings generated from drilling a Well.
	A cross section depicting the depression of the cuttings trench shall be provided on the Form 27 Initial for the cuttings trench closure.

6 COAs

### Attachment List

<b>Att Doc Num</b>	<b>Name</b>
403136241	PIT PERMIT SUBMITTED
403136387	OTHER
403136395	DESIGN: PLAN AND CROSS SECTION
403136442	SENSITIVE AREA DETERMINATION
403136444	OPERATIONS PLAN
403136468	TOPOGRAPHIC MAP

Total Attach: 6 Files

### General Comments

<b>User Group</b>	<b>Comment</b>	<b>Comment Date</b>
Environmental	OGLA task removed.	09/08/2022
Environmental	Form 27 Doc #403119190 was submitted on 7/28/2022 and depicts soil samples extending to 10 feet below the ground surface. The total depth of the pit is 19 feet below the ground surface.	09/08/2022

Total: 2 comment(s)