

## Melissa Luke

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**From:** Taylor Elm - DNR <taylor.elm@state.co.us>  
**Sent:** Friday, February 17, 2023 3:50 PM  
**To:** Scott Ghan  
**Cc:** Adam Tankersley; Melissa Luke; Jeff Kirtland  
**Subject:** Re: Rule 312 Consultation Request - TEP Rocky Mountain LLC

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Thanks, Scott.

CPW agrees that the originally proposed BMPs are still adequate for the proposed P&A work.

Take care,

On Fri, Feb 17, 2023 at 1:38 PM Scott Ghan <[sghan@terraep.com](mailto:sghan@terraep.com)> wrote:

Good afternoon Taylor,

We wanted to inform you of a change to our previously discussed and approved best management practices associated with casing repair operations at the RWF 433-17 (API# 045-11467, Loc I.D. 335063). After further review by our Engineering Team, we are no longer planning to repair this well and will be informing the COGCC of our intent to plug the well. As noted in the correspondence below, plugging operations are also considered subsequent operations, per COGCC Rule 312, and require CPW consultation.

The operations associated with well plugging are very similar to the operations of the casing repair when considering the equipment utilized and the expected duration of the activities. Due to the similarities in both operations, TEP will implement the same mule deer related best management practices that were planned for the casing repair operations. Please note that there are other producing wells on this location and no reclamation activities will be required as a result of the plugging of the RWF 433-17 well.

Please confirm that the original best management practices associated with the previously planned casing repair operation are adequate for the planned RWF 433-17 plugging operations. After receiving your confirmation, we will include this correspondence in our COGCC Well Abandonment Report submittal.

Thanks and have a great weekend,

**Scott Ghan**

Senior Regulatory Specialist

TEP Rocky Mountain LLC

(Terra Energy Partners LLC)

PO Box 370 | 1058 CR 215 | Parachute, CO 81635

Office Phone (970) 263-2725

Cell Phone (970) 744-8128

Email- [sghan@terraep.com](mailto:sghan@terraep.com)



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**From:** Taylor Elm - DNR <[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us)>

**Sent:** Tuesday, January 17, 2023 12:23 PM

**To:** Jeff Kirtland <[JKirtland@terraep.com](mailto:JKirtland@terraep.com)>

**Cc:** Adam Tankersley <[ATankersley@terraep.com](mailto:ATankersley@terraep.com)>; Melissa Luke <[mluke@terraep.com](mailto:mluke@terraep.com)>; Scott Ghan <[sghan@terraep.com](mailto:sghan@terraep.com)>

**Subject:** Re: Rule 312 Consultation Request - TEP Rocky Mountain LLC

Jeff,

Thank you for compiling the information for all of the proposed locations. This helps tremendously for a quick review. I have reviewed the HPH layers present and the associated best management practices. These are sufficient to protect wildlife resources during the proposed activities. CPW has no additional recommendations at this time. If you need any additional information, please give me a call or email.

Take care,

Taylor Elm

Northwest Region Energy Liaison



P 970.947.2971 | C 970.986.9767

711 Independent Ave. Grand Junction, CO 81505

[taylor.elm@state.co.us](mailto:taylor.elm@state.co.us) | [cpw.state.co.us](http://cpw.state.co.us)

On Thu, Jan 12, 2023 at 6:47 AM Jeff Kirtland <[JKirtland@terraep.com](mailto:JKirtland@terraep.com)> wrote:

Good morning, Taylor,

As we have discussed recently, operators are required to consult with CPW under COGCC Rule 312 for subsequent operations, which includes well repairs and plugging operations. For your informant, COGCC released additional [guidance](#) around this process last week.

For today, below is a list of wells and pads that we are planning subsequent operations including the identified HPH associated with these locations. We are planning to begin operations upon approval by COGCC and BLM, if required.

As a part of this process, we are required to attach any agreed upon BMPs and correspondence between CPW and the operator documenting consultation. In order to ensure proper well operations, TEP has proposed the Best Management Practices listed below for implementation during planned activities to minimize potential impacts to wildlife. However, if additional BMPs are necessary please let me know.

- Boise B-19P-O1 (103-11109, Loc 335891) – Casing Repair
  - Rule 1202.c NSO Habitats
    - Aquatic Native Species Conservation Waters
  - Rule 1202.d. Density Habitats
    - Mule Deer Severe Winter Range
- Boise B-19P-P3 (103-11034, Loc 335891) – Either a casing repair or P&A
  - Rule 1202.c NSO Habitats
    - Aquatic Native Species Conservation Waters
  - Rule 1202.d. Density Habitats
    - Mule Deer Severe Winter Range
- RWF 433-17 (045-11467, Loc 335063) – Casing repair

- Rule 1202.d Density Habitats
  - Mule Deer Severe Winter Range
  - Mule Deer Winter Concentration Areas
- Federal RU 443-6 (045-18172, Loc 335044) – Casing repair
  - Rule 1202.c NSO Habitats
    - Aquatic Cutthroat Trout Designated Crucial Habitat (southern edge of pad and access road)
  - Rule 1202.d Density Habitats
    - Elk Winter Concentration Area

Best Management Practices:

Mule Deer and Elk BMPs

1. Wildlife – Minimization: To minimize the potential for wildlife related traffic accidents, TEP has implemented speed restrictions for all lease roads and requires that all TEP employees and contractors adhere to these posted speed restrictions.
2. Wildlife – Minimization: TEP will make best efforts to minimize operations at these location during winter months by conducting operations, when possible, between 9:00am to 4:00pm when wildlife activity minimal.

Aquatic Habitat BMPs

1. Wildlife – Minimization: Operator will be compliant with all COGCC Rule 1202.a Operating Requirements.
2. Wildlife – Minimization: Operator will maintain adequate spill response equipment at the Oil and Gas Location during workover operations.
3. Wildlife – Minimization: When dust suppression is required on the pad and/or access road, potable water from a nearby source will be utilized when within cutthroat trout designated crucial habitat and/or native fish and other native aquatic species conservation waters.

Please let me know if you have any questions, or if these BMPs are satisfactory, please confirm your agreement with this information in a response that we will include with future submittals.

Thank you, sir!

**Jeff Kirtland**

Regulatory Manager

TEP Rocky Mountain LLC

(Terra Energy Partners LLC)

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