

State of Colorado  
Energy & Carbon Management Commission

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Document Number:  
403987012

Date Received:  
11/07/2024

## FIR RESOLUTION FORM

### Overall Status:

#### CA Summary:

2 of 3 CAs from the FIR responded to on this Form

2 CA Completed  
0 Factual Review Request

### OPERATOR INFORMATION

ECMC 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
Toews, Wesley		wtoews@blm.gov
TEP		COGCCInspectionReports@terraep.com

### ECMC INSPECTION SUMMARY:

FIR Document Number: 708904871  
Inspection Date: 10/16/2024 FIR Submit Date: 10/22/2024 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: 335743

Location Name: DOE Number: RM 2-8 County: \_\_\_\_\_  
Qtrqtr: NESE Sec: 8 Twp: 6S Range: 94W Meridian: 6  
Latitude: 39.537454 Longitude: -107.904487

#### FACILITY - API Number: 05-045- -00 Facility ID: 335743

Facility Name: DOE Number: RM 2-8  
Qtrqtr: NESE Sec: 8 Twp: 6S Range: 94W Meridian: 6  
Latitude: 39.537454 Longitude: -107.904487

### CORRECTIVE ACTIONS:

1 CA# 199947

Corrective Action: Comply with CECMC wildlife rules Date: 10/29/2024

Response: CA COMPLETED Date of Completion: 10/22/2024

Operator Comment: All of the exhaust stacks at this location have been inspected multiple times and production personnel have documented that all stacks have internal screens (not visible). In addition to internal screens, some of the exhaust stacks also have the external, visible cones. In summary, all exhaust stacks at this location have one or more screens that effectively exclude wildlife and mitigate any potential hazard to wildlife. Please note this response for future inspections.

UPDATE: On several occasions, TEP has confirmed that all exhaust stack have screens that effectively exclude wildlife. Some of the screens are inside the exhaust stacks (not visible) and some exhaust stacks have the external (visible) cones. Although TEP has verified to ECMC that all stacks have screens, ECMC inspection personnel have stated that their desire is to "trust but verify," and therefore they wish to inspect the stacks for themselves. ECMC has the right to perform their own independent verification through safe and reasonable methods; however, TEP requests that ECMC submit any plans for conducting an inspection of these stacks to TEP for prior approval to ensure that the activity can be conducted in a manner that is protective of all personnel and TEP property.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative: \_\_\_\_\_

3 CA# 199949

Corrective Action: Comply with CECMC Stormwater rules

Date: 11/06/2024

Response: CA COMPLETED

Date of Completion: 11/04/2024

Operator Comment: The NGC unit (and the associated chemical tanks) are no longer needed and will be removed from the location. In the meantime, there are adequate storm water BMPs around the perimeter of the pad to minimize and control storm water discharges from this location.

UPDATE: The mobile compressor units have been removed from this location and therefore this is no longer a corrective action for this location. Upon further investigation of this equipment, the skid-mounted compressor unit is a self-contained unit with built-in secondary containment. All three of the chemical tanks on this skid have built-in drain pans as shown in the attached photos. Further, the drain pans (one on each end of the skid) are connected to, and drain to a larger secondary containment pod that is located at the base of the entire skid unit. See attached photos. Lastly, there are storm water BMPs that surround this pad which are designed to minimize and control the discharge of any pollutants (sediment or chemical) from this location. Therefore, this location does comply with the applicable CECMC storm water management rules.

ECMC Decision: \_\_\_\_\_

ECMC  
Representative: \_\_\_\_\_

#### OPERATOR COMMENT AND SUBMITTAL

Comment: CA #199947: UPDATE: On several occasions, TEP has confirmed that all exhaust stack have screens that effectively exclude wildlife. Some of the screens are inside the exhaust stacks (not visible) and some exhaust stacks have the external (visible) cones. Although TEP has verified to ECMC that all stacks have screens, ECMC inspection personnel have stated that their desire is to "trust but verify," and therefore they wish to inspect the stacks for themselves. ECMC has the right to perform their own independent verification through safe and reasonable methods; however, TEP requests that ECMC submit any plans for conducting an inspection of these stacks to TEP for prior approval to ensure that the activity can be conducted in a manner that is protective of all personnel and TEP property.

CA #199949: UPDATE: The mobile compressor units have been removed from this location and therefore this is no longer a corrective action for this location. Upon further investigation of this equipment, the skid-mounted compressor unit is a self-contained unit with built-in secondary containment. All three of the chemical tanks on this skid have built-in drain pans as shown in the attached photos. Further, the drain pans (one on each end of the skid) are connected to, and drain to a larger secondary containment pod that is located at the base of the entire skid unit. See attached photos. Lastly, there are storm water BMPs that surround this pad which are designed to minimize and control the discharge of any pollutants (sediment or chemical) from this location. Therefore, this location does comply with the applicable CECMC and CDPHE storm water management rules.

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 Environmental Lead

Date: 11/7/2024 3:44:05 PM

#### ATTACHMENT LIST

View Attachments in Imaged Documents on ECMC website (<http://ecmcweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
403987012	FIR RESOLUTION SUBMITTED
403987119	Oil tank drip pan and drain
403987121	Chemical tank drip pan and drain
403987125	Drain line and containment pod along base of skid

Total Attach: 4 Files