

State of Colorado Energy & Carbon Management Commission

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Document Number: 403888562 Date Received: 08/14/2024

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: [ ] PERMIT [X] REPORT ECMC PIT NUMBER: 489329

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

ECMC 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: Federal RG 11-13-298 Cutting Trench Operator's Pit/Facility Number:
API Number (associated well): 05- 00
ECMC Location ID (associated location): 482958 Or Form 2A #
Pit Location (QtrQtr, Sec, Twp, Rng, Meridian): NWNW-13-2S-98W-6
Latitude: 39.882823 Longitude: -108.345851 County: RIO BLANCO

Operation Information

Construction Date: 07/15/2024 Actual or Planned: Actual 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):
[ ] 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 the installation of twenty-two (22) natural gas wells to be drilled at the Federal RG 11-13-298 well pad (ECMC location ID 482958). The document number for the approved Form 2A for this location is doc#402932455. The approved Form 2A, the location layout drawings, and the Waste Management Plan for managing drill cuttings at this location are all attached to this Form 15.

Site Conditions

Enter 5280 for distance greater than 1 mile.

Distance (in feet) to the nearest surface water: 1733 Ground Water (depth): 420 Water Well: 4069

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: 347 Width: 160 Depth: 19 Calculated Working Volume (in barrels): 77320

Flow Rates (in bbl/day): Inflow: 505 Outflow: \_\_\_\_\_ Evaporation: \_\_\_\_\_ Percolation: \_\_\_\_\_

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

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

Secondary Liner (if present): Type: none Thickness (mil): \_\_\_\_\_

Operational Lifespan, per manufacturer's specs (years): 0

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): 1 (Round to nearest whole ton.)

Other Information:

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

Operator  
Comments:

Please route to John Heil.

All drill cuttings will be treated/ amended onsite to meet ECMC 915-1 clean-up standards and will be disposed of on-site. Any cuttings exceeding the maximum capacity of the cuttings trench will be hauled offsite to a permitted E&P waste disposal facility that is authorized to receive drill cuttings waste.

In compliance with Rule 911.a, a Form 27 will be submitted to document final closure of the Federal 11-13-298 drill cuttings trench and to convey sampling data that supports closure of the cuttings trench.

Under the Pit Design and Construction Information section of this Form 15, the "Calculated Working Volume" of the cuttings trench has been converted from cubic yards (16,080) to barrels (~77,320). Similarly, the daily flow rate has been estimated / converted from cubic yards to barrels per day (inflow rate).

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 manufactured liners. Therefore, a default value of 1000 years was used.

The approved Form 2A for this location along with site diagrams / cross sections, the Waste Management Plan, the Sensitive Area Determination summary, and a topographic map showing the site location are all attached to this Form 15 as additional reference information.

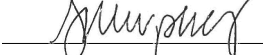
**Certification**

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: 08/14/2024

**Approval**

Signed:  Title: Director of ECMC Date: 02/20/2025

## Operator Best Management Practices

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

**CONDITIONS OF APPROVAL, IF ANY LIST**

<u>COA Type</u>	<u>Description</u>
	Waste Management Plan Table 5, Waste Handling Summary reports Contaminated Soils with a Disposal Type of "On-site Disposal" and a Disposal location of "Federal / O&G Location or Commercial." Per the definition of a Cuttings Trench, only dried cuttings generated from drilling a Well may be stored and disposed of in a cuttings trench. Contaminated Soils are not allowed in the cuttings trench or to be disposed of on location per Rule.
	Contingency Sampling of the water/bentonite based drill cuttings will occur regardless of whether the original "background" or "baseline" samples collected from each well drilled are compliant with Table 915-1. The 6-point composite samples from each well may be used for preliminary analysis and waste profiling; however, discrete sample results will be required for confirmation sampling. The operator will need to close out the cuttings trench with a Form 27. The operator will propose the number of discrete samples, the locations, and depth intervals for the confirmation samples. The depth intervals will be selected to provide sufficient coverage between 0 and 19 feet below the final top surface of the cuttings within the trench. Upon approval of the Form 27, TEP will collect the proposed samples and analyze them for the Table 915-1 constituents.
2 COAs	

### ATTACHMENT LIST

<u>Att Doc Num</u>	<u>Name</u>
403888562	PIT PERMIT SUBMITTED
403889114	OTHER
403889116	SENSITIVE AREA DETERMINATION
403889118	OTHER
403889128	TOPOGRAPHIC MAP
403889131	DESIGN: PLAN AND CROSS SECTION

Total Attach: 6 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Environmental	Federal RG 11-13-298 Cutting Trench Drill Cuttings Trench has been constructed, ECMC has changed this from Pit Permit to Pit Report.	02/20/2025
OGLA	LAS review completed and task passed.	09/25/2024

Total: 2 comment(s)