FORM 15
Rev 04/21

State of Colorado
Energy & Carbon Management Commission

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Document Number: 404132307
Date Received: 03/19/2025

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** ☒ **REPORT** ECMC PIT NUMBER: 493176

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: TR 32-28-597 Cuttings Trench Operator's Pit/Facility Number:
API Number (associated well): 05- 00
ECMC Location ID (associated location): 324040 Or Form 2A #
Pit Location (QtrQtr, Sec, Twp, Rng, Meridian): SWNE-28-5S-97W-6
Latitude: 39.587273 Longitude: -108.281472 County: GARFIELD

Operation Information

Construction Date: 02/28/2025 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.
☒ **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, add drying agent

Offsite disposal of pit contents: ☐ Injection; ☐ Commercial; ☒ Reuse/Recycle; ☐ NPDES; Permit Number:

Other Information:

Drill cuttings will be treated (i.e., mixing, blending, amending) to meet COGCC 915-1 cleanup standards. Once Table 915-1 standards have been met, the drilling pit will be closed and reclaimed as described in the approved Form 2A (attached). Any volume of cuttings generated exceeding the capacity of the cuttings trench and/or cannot be managed onsite in accordance with the Form 2A will be hauled offsite to the Starkey CWMF Cuttings Trench (Fac. ID 476647) or to an approved commercial disposal facility as outlined within the Waste Management Plan included in the Form 2A.

Site Conditions

Enter 5280 for distance greater than 1 mile.

Distance (in feet) to the nearest surface water: 2491 Ground Water (depth): 100 Water Well: 5280

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: 525 Width: 45 Depth: 18 Calculated Working Volume (in barrels): 76086

Flow Rates (in bbl/day): Inflow: 634 Outflow: Evaporation: Percolation:

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

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

Seconday 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:

All drill cuttings will be treated to meet ECMC 915-1 clean up standards and will be managed on-site as outlined within the Form 2A and Waste Management Plan (WMP). In compliance with Rule 911.a, a Form 27 will be submitted to document final closure of the TR 32-28-597 cuttings trench, and to convey sampling data that supports closure of the drilling pit.

As shown on the attached site plans, cross sectional diagrams, and construction drawings, the cuttings trench layout is in an "L" shape position. The eastern side of the trench dimensions are approximately 403'x40'x18' and the northern side of the trench is approximately 122'x50'x18'. For the purposes of determining daily working capacities and daily flow rates, the dimensions of 525'x45'x18' were used with a average width consisting of 45-feet.

All drill cuttings produced at this location are derived from bentonitic, water-based drilling fluids. All drill cuttings will be treated to meet ECMC 915-1 cleanup standards prior to final disposition as outlined within the WMP or via Form 27 outlining updated proposed management options.

Under the Pit Design and Construction Information section, the "Calculated Working Volume" of the drill cuttings has been converted from cubic yards 15,822 of post mixed/solidified to barrels (~ 76,086 bbls). Again, this number represents the total volume of drill cuttings generated from drilling the 17 new wells at this location.

Due to space constraints of the pad and potential for increased drying agent needed to account for seasonal weather precipitation, the total volume of drill cuttings may exceed the capacity of the trench. As outlined within the Form 2A WMP and Reclamation Plan, alternate cuttings management options consist of beneficial reuse onsite, offsite management at the Starkey CWMF Cuttings Trench, or disposal to a commercial disposal facility. A Form27 will be submitted providing additional details for the onsite and offsite management of cuttings.

Also, the "Operational Lifespan, per the manufacturer's specs (years) is a required value to complete the 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.

The BMPs proposed for this location (and drilling pit) are outlined in the approved Form 2A (doc # 403369764). See attached Form 2A.

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: Kris Rowe

Title: TEP Environmental Email: Krowe@terraep.com Date: 03/19/2025

Approval

Signed: Title: Director of ECMC Date: 02/13/2026

Operator Best Management Practices

No	BMP/COA Type	Description

CONDITIONS OF APPROVAL, IF ANY LIST

COA Type	Description
	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 18 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.
	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. No other E&P Waste or non-E&P waste shall be stored or disposed of in the cuttings trench.
2 COAs	

ATTACHMENT LIST

Att Doc Num	Name
404132307	PIT REPORT SUBMITTED
404132578	AS BUILT: PLAN AND CROSS SECTION
404132585	DESIGN: PLAN AND CROSS SECTION
404132589	SENSITIVE AREA DETERMINATION
404132590	OPERATIONS PLAN
404132633	DETAILED SITE PLAN

Total Attach: 6 Files

General Comments

User Group	Comment	Comment Date
Environmental	AFischer waive OGLA Task and provided Final Review.	02/13/2026
Environmental	Attached DETAILED SITE PLAN doc 404132633 (Reclamation Plan – 304.c.(16) and OPERATIONS PLAN - 404132590 (Waste Management Plan) were approved as attachments to Form 2A-401258468. Form 2A-401258468 was not attached.	02/02/2026
Environmental	Form 15 was submitted on 3/19/2025 and construction date is 02/28/2025.	02/02/2026

Total: 3 comment(s)