

From: [Mike Gardner](#)
To: corey.depaolo@state.co.us
Cc: [Nate Lenard](#); [Brandon Baker](#); [Paul Fortunato](#); [Heather Foor](#); [Shawn Brennan](#)
Subject: FW: COGCC FIELD INSPECTION REPORT [Doc#699804078, Loc Id: 413524 Name: SPECIALTY RESTAURANTS SG 33-32] SUBMITTED NOTICE
Date: Friday, January 28, 2022 5:57:00 PM
Attachments: [insp_402940884.pdf](#)
Importance: High

Corey,

Production personnel visited the location right after we spoke this afternoon, and we are taking the following immediate actions:

- TEP personnel went the location at approximately 3:30 this afternoon prepared to sweep, broom, or shovel any debris off of the road. Upon arriving, personnel found evidence of muddy tire tracks but no chunks or globs of mud that could even be removed by hand.
- TEP will have a contractor go out to the location tomorrow and attempt to remove the minor amount of sediment from the road way.
- TEP will put down more rock at the entrance / exit to the location in an attempt to “*minimize*” the amount of sediment that may adhere to vehicle tires. However, there are no gravel pits open tomorrow (1/29/22) and the earliest we can access aggregate will be Monday morning.
- We will close access to the location until then to prevent vehicle traffic from entering / exiting the pad.
- Self-Inspection: We checked our internal storm water inspector records for this location. The location was last inspected on January 11, 2022 and all BMPs were found to be in good condition.
- Please note that, as shown in your photos #5804 and #5809, the existing cattle guard is successfully knocking off most of the mud from vehicles prior to vehicles exiting the pad. TEP maintains this cattle guard as part of our attempts to *minimize* erosion and the transport of sediment off the location.

As you know, the snow is melting on warm sunny days like today and it is virtually impossible to not leave any trace or tracks when coming off of a muddy location. As required by Rule 1002.f, we are minimizing (*not eliminating*) the amount of sediment that is transported off location. The soft conditions noted on your inspection report can also be found at many residential rural driveways, farm entrances, access points to almost all un-improved BLM/county roads, etc. this time of year. I’m not sure why this necessitates a 24-hour response ... but we are doing our best to comply with your request given the short notification.

Below are some of the BMPs that have been implemented in accordance with good engineering practices as described at 1002.f.(2).F:

In compliance with 1002.f.(2).F, TEP is controlling access to this location, we will attempt to clean the impacted roadway as much as is reasonably possible, and we will put down some additional rock aggregate at the entrance to the pad. Also, the cattle guard noted above is acting as an effective tracking pad that vibrates much of the sediment off of vehicle tires as shown in your photographs.

1002.f.(2).F

F. Vehicle tracking control practices to control potential sediment discharges from operational roads, well pads, and other unpaved surfaces. Practices **could include** road and pad design and maintenance to minimize rutting and tracking, controlling site access, street sweeping or scraping, tracking pads, wash racks, education, or other sediment controls.

In compliance with 1002.f.(2).D, TEP is conducting self-inspections of this location to evaluate site BMPs. As mentioned above, the last inspection was conducted on January 11, 2022 and all BMPs were found to be in good working condition.

1002.f.(2)D. Self-inspection, maintenance, and good housekeeping procedures and schedules to facilitate identification of conditions that could cause breakdowns or failures of BMPs. These procedures shall include

measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal practices. In conducting inspections and maintenance relative to stormwater runoff, operators shall consider seasonal factors, such as winter snow cover and spring runoff from snowmelt, to ensure site conditions and controls are adequate and in place to effectively manage stormwater.

Mike Gardner
Cell: (970) 623-4875
Office: (970) 263-2760
mgardner@terraep.com

From: COGCC Field Inspection Report <dnr_iform.helpdesk@state.co.us>
Sent: Friday, January 28, 2022 1:43 PM
To: COGCC Inspection Reports <COGCCInspectionReports@terraep.com>
Cc: corey.depaolo@state.co.us
Subject: COGCC FIELD INSPECTION REPORT [Doc#699804078, Loc Id: 413524 Name: SPECIALTY RESTAURANTS SG 33-32] SUBMITTED NOTICE
Importance: High

Colorado
Oil & Gas Conservation
Commission
Department of Natural Resources

1120 Lincoln St. Suite 801
Denver, CO 80203
Phone: (303) 894-2100
FAX: (303) 894-2109
cogcc.state.co.us

COGCC Field Inspection Report

ATTACHED REPORT HAS BEEN SUBMITTED TO COGCC DATABASE BASED ON FIELD INSPECTION RESULTS. OPERATORS HAVE SEVEN (7) DAYS TO REVIEW BEFORE THE INSPECTION FORM IS POSTED TO THE WEBSITE.

PLEASE REVIEW ENTIRE REPORT. **COMMENTS** ARE HIGHLIGHTED IN **BLUE**, **CORRECTIVE ACTION ITEMS** ARE HIGHLIGHTED IN **RED**.