

## Mike Gardner

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**To:** COGCC Field Inspectors  
**Subject:** COGCC Rule 1002.f.2.(F): Vehicle Tracking Control Practices

COGCC Rule 1002.f.2.(F) states: “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 this rule, TEP employs numerous sediment controls including pad design, controlling site access, education and training employees to not travel on roads / pads during extremely wet and muddy conditions, signage prohibiting travel during muddy conditions, routine road and pad maintenance, use of road base and rock to harden surfaces, and blading / dragging ruts from roads and pads. All of these practices are implemented to **minimize rutting and tracking** which is what is required by this rule. Rule 1002.f.2.(F) does not mandate the use of tracking pads; rather, a tracking pad is simply one of the options (tools) that could be used for controlling sediment, but their use is not required. TEP does use tracking pads when / if it makes sense to do so.

Further, as stated in the rule, the purpose of these controls are to **minimize rutting and tracking**; NOT to completely eliminate rutting and tracking. This interpretation complies not only with the literal reading of the rule, but also with the intent of this requirement as found in COGCC’s Statement of Basis and Purpose which was used in the development of this Rule.