

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:

402969544

Date Received:

03/01/2022

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

6 of 6 CAs from the FIR responded to on this Form

6 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC 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

Fischer, Alex

alex.fischer@state.co.us

Heil, John

john.heil@state.co.us

TEP

COGCCInspectionReports@terraep.com

denise.arthur@state.co.us

COGCC INSPECTION SUMMARY:

FIR Document Number: 696203422

Inspection Date: 12/07/2021

FIR Submit Date: 12/10/2021

FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: TEP ROCKY MOUNTAIN LLC

Company Number: 96850

Address: PO BOX 370

City: PARACHUTE State: CO Zip: 81635

LOCATION - Location ID: 452011

Location Name: FEDERAL Number: RU 31-17 County: \_\_\_\_\_

Qtrqtr: NWNE Sec: 17 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.449865 Longitude: -107.795693

FACILITY - API Number: 05-045- -00 Facility ID: 452011

Facility Name: FEDERAL Number: RU 31-17

Qtrqtr: NWNE Sec: 17 Twp: 7S Range: 93W Meridian: 6

Latitude: 39.449865 Longitude: -107.795693

CORRECTIVE ACTIONS:

1 ☒ CA# 158568

Corrective Action: Install signage/labelling on tanks/containers.

Date: 01/09/2022

Response: CA COMPLETED

Date of Completion: 12/15/2021

Tank labels were installed on all temporary flowback tanks. The flowback tanks were taken out of service at the end of December 2021.

Operator  
Comment:

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

2  CA# 158569

Corrective Action: Submit information identifying what the observed materials are within a resolution.

Date: 12/16/2021

Response: CA COMPLETED

Date of Completion: 12/31/2021

Operator Comment: No issues observed besides soils of varying color. The area of the pit will be buried as part of the reclaim. Due to storms in mid December 2021 ... there is nothing else to do with this portion of the inspection. The wellheads and cellar area will be cleaned when completions activity is finished at the end of December 2021. As part of the rig down and de-mobilization of the temporary equipment, the pad surface will be cleaned including the wellheads.

COGCC Decision: **Not Approved**

COGCC Representative: Operator has provided no documentation to support comment.

3  CA# 158570

Corrective Action: Remove impacted/stained material around the wells.

Date: 12/19/2021

Response: CA COMPLETED

Date of Completion: 12/27/2021

Operator Comment: The wellheads and cellar area were cleaned when completions activity was completed at the end of December 2021. As part of our rig down and de-mobilization of the temporary equipment, the pad surface will be cleaned including the wellheads.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

4  CA# 158571

Corrective Action: Comply with Rule 1002.c; implement controls to prevent further mixing and contamination of topsoil.

Date: 11/03/2021

Response: CA COMPLETED

Date of Completion: 12/14/2021

Operator Comment: Due to large storm event in mid December, this item will be addressed in the spring of 2022 when the location dries out and site conditions allow.

COGCC Decision: **Not Approved**

COGCC Representative: OGCC Decision "Not Approved". Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments corrective action does not appear to have been completed; COGCC can not accept "Corrective Action Completed" for future dates.

5  CA# 158572

Corrective Action: Comply with Rule 606.c, 1002.c and 1003.f. Due to the onset of winter conditions, additional weed management will need to be conducted in the 2022 growing season to prevent further spread and establishment.

Date: 11/12/2021

Response: CA COMPLETED

Date of Completion: 12/15/2021

Operator Comment: Due to the onset of winter conditions, additional weed management will be conducted during the 2022 growing season to prevent further spread and establishment.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Approved pending re-inspection of this FIR resolution acknowledges the document was received. It is not an acknowledgement that the corrective action has been passed. Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

6  CA# 158573

Corrective Action: Comply with Rule 1002.f and install or repair stormwater and erosion control measures in accordance with good engineering practices. Ensure control measures are adequate for the site's conditions, and maintained in proper functioning condition.

Date: 11/03/2021

Response: CA COMPLETED

Date of Completion: 12/31/2021

Operator Comment: Site is under winter conditions. Location will be graded, ruts removed, and BMPs maintained when site dries out and conditions allow. See attached response.

COGCC Decision: **Not Approved**

COGCC Representative: COGCC Decision "Not Approved". Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety. Based on operator comments within the resolution, and documents attached, corrective action does not appear to have been completed; A FIRR, "Corrective action complete" is not a forum for TEP to disagree/argue with the corrective actions. COGCC is unable to approve this resolution as the corrective actions have not been completed

Observed compliance issues have been ongoing since inspection 696203309 dated 10/25/2021; it is COGCC's expectation that an Oil and Gas Location is in compliance with stormwater requirements at all times; corrective action will remain applicable

#### OPERATOR COMMENT AND SUBMITTAL

Comment: Corrective actions have been completed and/or addressed. See attached responses.

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 Env Lead

Date: 3/1/2022 3:05:31 PM

### ATTACHMENT LIST

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

<u>Document Number</u>	<u>Description</u>
402969544	FIR RESOLUTION SUBMITTED
402969594	Site stabilization response
402969595	Rule 1002.f response

Total Attach: 3 Files