

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402408217

Date Received:

05/28/2020

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

2 of 2 CAs from the FIR responded to on this Form

2 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: PO BOX 370

City: PARACHUTE State: CO Zip: 81635

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name

Phone

Email

COGCCInspectionReports@terraep.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 696201236

Inspection Date: 05/04/2020

FIR Submit Date: 05/05/2020

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: 335106

Location Name: NAUGLE-66S95W Number: 25NENE County: _____

Qtrqr: NENE Sec: 25 Twp: 6S Range: 95W Meridian: 6

Latitude: 39.501449 Longitude: -107.938971

FACILITY - API Number: 05-045- -00 Facility ID: 335106

Facility Name: NAUGLE-66S95W Number: 25NENE

Qtrqr: NENE Sec: 25 Twp: 6S Range: 95W Meridian: 6

Latitude: 39.501449 Longitude: -107.938971

CORRECTIVE ACTIONS:

1 ☒ CA# 138627

Corrective Action: Comply with Rule 603.f and 1003.a: Remove equipment/vehicles/supplies not necessary for use on the Location.

Date: 05/20/2020

Response: CA COMPLETED

Date of Completion: 05/28/2020

Operator Comment: The area in question is not part of the pad and the permitted area of disturbance, and is not TEP's responsibility. The original plat package depicting the permitted area has been attached. The equipment observed by the inspector belongs to the land owner ... not TEP. No further actions are planned.

COGCC Decision: Not Approved

COGCC Representative: Based on the historic aerial imagery and records available, it is unclear to the COGCC that the area observed on the west end of the Location was constructed independently from the Location, and not a result of Oil and Gas ("O&G") disturbance.

Therefore the COGCC will be requiring a letter from the Surface Owner identifying that the area appearing to be O&G disturbance was not built by an O&G Operator in association with the Naugle-66S95W25NENE Location; that the area has not been or currently utilized for O&G activities, and is under his or her management and responsibility.

Submit documentation attached to a Form 4 Sundry; The corrective action will remain applicable until documentation has been provided and sundry approved.

Additionally, an Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors.

2  CA# 138628

Corrective Action: Comply with Rule 1003.b; Conduct reclamation on areas of the Location not needed for production activities.

Date: 07/31/2020

Response: CA COMPLETED

Date of Completion: 05/28/2020

Operator Comment: The area in question is not part of the pad and the permitted area of disturbance. Any disturbances or issues associated with the area identified by the inspector are not the responsibility of TEP. The original plat package depicting the permitted area has been attached. The land owner has used this area for years. No further actions are planned.

COGCC Decision: **Not Approved**

COGCC Representative: Based on the historic aerial imagery and records available, it is unclear to the COGCC that the area observed on the west end of the Location was constructed independently from the Location, and not a result of Oil and Gas ("O&G") disturbance.

Therefore the COGCC will be requiring a letter from the Surface Owner identifying that the area appearing to be O&G disturbance was not built by an O&G Operator in association with the Naugle-66S95W25NENE Location; that the area has not been or currently utilized for O&G activities, and is under his or her management and responsibility.

Submit documentation attached to a Form 4 Sundry; The corrective action will remain applicable until documentation has been provided and sundry approved.

Additionally, an Operator response of "Corrective Action Complete" is a notification to the State that the corrective action has been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors.

OPERATOR COMMENT AND SUBMITTAL

Comment: The area and equipment identified by the inspector as being out of compliance do not belong to TEP, nor are they associated with our operations. This area is outside of the permitted pad location and has been used by the surface owner for many years. The area identified by the inspector and the equipment are not the responsibility of TEP. No further actions are planned.

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 Environmental

Date: 5/28/2020 4:42:29 PM

ATTACHMENT LIST

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

Document Number	Description
402408217	FIR RESOLUTION SUBMITTED
402408230	Survey Plats for the PA 42-25

Total Attach: 2 Files