

**FORM
INSP**

Rev
X/20

**State of Colorado
Oil and Gas Conservation Commission**

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



Inspection Date:

12/07/2021

Submitted Date:

12/10/2021

Document Number:

696203422

FIELD INSPECTION FORM

Loc ID 452011 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

OGCC Operator Number: 96850
Name of Operator: TEP ROCKY MOUNTAIN LLC
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

Findings:

- 12 Number of Comments
- 6 Number of Corrective Actions
- Corrective Action Response Requested

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
, TEP		COGCCInspectionReports@terraep.com	
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
452011	LOCATION	AC			-	FEDERAL RU 31-17	RI

General Comment:

On 12/7/2021, Reclamation Specialist Trujillo conducted a reclamation and stormwater inspection at TEP Rocky Mountain's Federal RU 31-17 location in Garfield County, Colorado.

This inspection is a followup to #696203309 to document compliance with the following corrective actions:

- Stormwater
- Undesirable plant species debris
- Management of E&P Waste
- Pit permitting
- Protection of Soils

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

New observed compliance issues per this inspection:

- Pad stabilization controls missing or insufficient
- Labeling on tanks
- Stained/impacted materials at wells

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location

Overall Good:

Signs/Marker:

Type	TANK LABELS/PLACARDS		
Comment:	Labelling on the produced water tank missing capacity information. Three large tanks observed with missing label information, or information not easily visible.		
Corrective Action:	Install signage/labelling on tanks/containers.	Date:	01/09/2022

Emergency Contact Number:

Comment:	<input type="text"/>	Date:	<input type="text"/>
Corrective Action:	<input type="text"/>		

Good Housekeeping:

Type	OTHER		
Comment:	Grey discolored/impacted soils observed on areas of the fill slopes/flat areas east of the pit; areas appear to be where the pit previously existed prior to it being reduced in size. A pile of grey material also observed on the southeast perimeter of the location; unclear at time of inspection what observed materials are.		
Corrective Action:	Submit information identifying what the observed materials are within a resolution.	Date:	12/16/2021
Type	OTHER		
Comment:	Stained/impacted materials observed at the wells.		
Corrective Action:	Remove impacted/stained material around the wells.	Date:	12/19/2021

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 452011 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)	
Drill Cuttings					
Comment	<p>Previous inspections observed that stormwater was permitted to flow into the cuttings trench; Fluids within trench preventing cuttings material from remaining dry, and considered E&P waste requiring removal.</p> <p>It was observed that fluids have been removed from the cuttings trench; pump observed on site in order to remove additional fluids.</p> <p>CA has been address; ensure cuttings remain free from fluids to remain dry.</p>				
Corrective Action					Date: _____
Drill Cuttings					
Comment	<p>Previous inspection observed that Form 2A Conditions of Approval ("COA") states that "no 'ONSITE' disposal of cuttings will be allowed without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying 'ONSITE' disposal and where the cuttings will be placed on the location"; co Waste Management Plan has been submitted. Inspection required Operator to submit documentation showing compliance with Form 2A COAs.</p> <p>Operator submitted F4 #402860536 on 11/3/2021 per the CA; sundry currently "in process".</p>				
Corrective Action					Date: _____

Spill/Remediation:

Comment:

Corrective Action: Date: _____

Emission Control Burner (ECB): _____

Comment:

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment [See Comment #1 under "COGCC Comments". See "interim reclamation" below regarding noxious weeds.](#)

Corrective Action [Comply with Rule 1002.c; implement controls to prevent further mixing and contamination of topsoil.](#)

Date **11/03/2021**

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____
 1003c. Compacted areas have been cross ripped? _____
 1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
 Cuttings management: _____
 1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? _____
 Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____
 TRANSECT RESULTS OF REFERENCE AREA% _____
 TOTAL % OF DESIRABLE VEGETATION COVER _____
 VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____ F _____

Comment Previous inspection observed Undesirable (noxious) plants including, but not limited to, Canada thistle, Plumeless thistle, Bull thistle, Houndsetongue, Common Mullein, established on the topsoil stockpiles and cutslopes of the Location. Inspection required Operator to comply with Rule 606.c, 1002.c and 1003.f., with additional weed management required in the 2022 growing season.

It was observed in this inspection that the undesirable plant weed debris remain on the topsoil stockpiles and cutslopes of the Location.

Corrective action has not been addressed and remains applicable.

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

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

Reminder: _____

Comment: _____

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____
 Debris removed _____ No disturbance /Location never built _____
 Access Roads Regraded _____ Contoured _____ Culverts removed _____
 Gravel removed _____
 Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____
 Compaction alleviation _____ Dust and erosion control _____
 Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT
 TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: _____

Corrective Action: _____

Date _____

Overall Final Reclamation _____

Well Release on Active Location

Multi-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See Comment #2 under "COGCC Comments".](#)

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

Pits: NO SURFACE INDICATION OF PIT

Type:	Lined:	Pit ID:	Lat:	Long:
Reference Point: _____	Other: _____	Length: _____	Width: _____	

Lining:

Liner Type: _____ Liner Condition: _____

Comment: _____

Corrective Action: _____

Date: _____

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective Action: _____

Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

Corrective Action: _____

Date: _____

Anchor Trench Present: _____ Oil Accumulation: _____ 2+ feet Freeboard: _____

Comment: [Previous inspection observed that the cuttings trench on the south end of the Location lacked permitting. Inspection required Operator to submit an eForm 15 Pit Report.](#)

[Operator submitted F15 #402859790 on 11/03/2021; form currently "in process".](#)

[This CA has been addressed.](#)

Corrective Action: _____

Date: _____

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>Previous inspection observed that BMPs to protect the stockpiled topsoil along the perimeter of the Location from degradation due to contamination, wind and water erosion, and to prevent weed establishment are missing or insufficient.</p> <p>It was observed in this inspection that BMPs to protect stockpiled topsoils remain missing or insufficient; erosion degradation remains evident; undesirable plant debris remain on topsoil; controls to prevent contamination/mixing of soils missing or insufficient; a single row of straw wattle erosion logs remain placed between the toe of the fill slopes and the topsoil stockpiles, and remain inadequate to manage runoff from the location, and to mitigate sediment discharge on the topsoil stockpiles.</p> <p>Corrective action has not been addressed and remains applicable</p>	trujilloam	12/09/2021
<p>COMMENT #2</p> <p>Previous inspection observed that stormwater and erosion control measures on the Location are missing or insufficient. Inspection required Operator to comply with 1002.f.</p> <p>It was observed in this inspection that stormwater and erosion control measures on the Location remain missing or insufficient</p> <ul style="list-style-type: none"> -Sediment trap at the Location entrance has not been installed in accordance with good engineering practices; control missing appropriate inlet and outlet protection in accordance with good engineering practices; geotextile lining not observed; erosion degradation under/around rip-rap material evident; offsite erosion degradation and sediment transport observed. -Control measures to protect and stabilize the cut/fill slopes of the Location and access road are missing or insufficient; erosion degradation evident. - Control measures to protect/stabilize the topsoil stockpiles remain missing or insufficient. - Control measures to stabilize/mitigate sediment transport from the stockpiled soils on the east end of the Location are inadequate; Operator has placed an erosion log (straw wattle) partially along the base, rather than around the entire perimeter of the stockpile. - Majority of erosion logs implemented have not been trenched/backfilled per good engineering practices. -Perimeter stormwater controls measures to manage runoff per good engineering practices remain missing or insufficient; stormwater runoff on the east end of the Location has resulted in erosion degradation; Operator has placed rock material within eroded areas in lieu of installing proper engineered stormwater controls to manage runoff into the sediment trap; rock material inadequate to properly manage runoff or prevent further degradation. -Control measures to stabilize the working pad area and mitigate tracking and sediment transport missing or insufficient. <p>Stormwater and erosion control BMPs to manage runoff, minimize erosion and degradation and sediment transport remain missing or insufficient on the Location per good engineering practices</p>	trujilloam	12/10/2021

Attached Documents

You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
696203423	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5603338