

**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:

03/09/2022

Submitted Date:

03/11/2022

Document Number:

696203469

FIELD INSPECTION FORMLoc ID 335177 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

Status Summary:☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**

9 Number of Comments

5 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
Murray, Richard		g.richard.murray@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Byers, Jim		jbyers@blm.gov	Mesa, Garfield, Gunnison
Heil, John		john.heil@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	
De Paolo, Corey		corey.depaolo@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335177	LOCATION	AC			-	DOE-66S96W 36SWNE	RI

General Comment:

On 3/09/2022, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountain's DOE-66S96W 36SWNE location in Garfield County, Colorado.

Location Fed Surface / Fed Mineral, and is located in a high priority habitat area. Location also exists in a Geologic Hazard area.

The following compliance issues were observed during this inspection:

- 602.c.: General Safety Requirements
- 1002.f.: Stormwater
- 1003.a: Unmarked Anchors

SUMMARY:

It was observed during this inspection that large areas of the hillside on the south end of the Location have sloughed off, resulting in an imminent threat to the stability of the working pad and production facilities, as well as to public health, safety welfare and the environment; potential salt impacts were also observed; the apparent salt staining appears to be migrating down the slope towards an unnamed drainage. Based on Google Earth aerials, the apparent salt staining first started occurring on the slope between 2014 and 2016. See photo log for details. Observed potential salt impact suggests the possibility of a spill originating from below-ground dump-lines or flow-lines at the facility equipment. Additional investigative measures are required by TEP.

This COGCC is requiring TEP to investigate the cause resulting in the destabilization of the slopes:

1) TEP shall investigate and identify factors that have resulted in the destabilization of the Location's southern slopes. Operator shall also implement Best Management Practices to stabilize the slope in order to comply with Rule 1002.f requirements, and to ensure that the Location will continue to operate in a safe manner in accordance with Rule 602.c.

2) Pursuant to 1104 requirements, TEP will be required to test the integrity of all dump and flow line equipment on the Location to determine if a spill has occurred.

3) In the event that a spill/release is discovered, TEP shall contact COGCC EPS and comply with Rule 912 reporting requirements.

Refer to the "Spill", "Equipment", "Reclamation" and "Stormwater" sections of this inspection report for additional details.

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.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	A section of the slope drain pipe on the southeast end of the Location has been cut and left on the slope; cut section of the pipe is considered debris.		
Corrective Action:	Comply with Rule 606	Date:	03/18/2022

Overall Good: ☐

Spills:				
Type	Area	Volume		
Comment:	See the "SUMMARY" section within the "General Comment" at the beginning of this report for summary regarding potential spill/release.			
Corrective Action:	In the event that a spill/release is discovered, TEP shall contact COGCC EPS and comply with Rule 912 reporting requirements upon discovery. Any remediation of a spill/release will be required to be completed no later than 6/1/2022.			Date: 06/01/2022

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		
Comment:	See "SUMMARY" within the "General Comment" at the beginning of this report regarding potential integrity issues.		
Corrective Action:	Conduct pressure testing to determine integrity of all dump lines and all flowlines, for all wells/associated wells on and off the Location. COGCC Integrity Staff required to be on Location to witness pressure test; pressure testing required within next two weeks. Submit pressure test data, as well as test data from the past two years attached to a Form 4 Sundry to both Western Integrity Inspector Richard Murray.		
		Date:	03/25/2022

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Reclamation - Storm Water - Pit**Interim Reclamation:**

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

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

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? Fail

Comment

Two unmarked Anchors observed on the western end of the Location; approximate locations 39.48228086/-108.05378659 and 39.4821022/-108.05368067

Corrective Action

Ensure all anchors on Location are marked in accordance with Rule 1003.a

Date **03/26/2022**

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 REVEGETATIONCropland

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? _____

Comment See "Stormwater" for reclamation requirements regarding slopes on the south end of the Location.

It was observed in this inspection that remaining interim areas of the Location appear to be progressing towards 1003 desirable perennial vegetative requirements. Continue to monitor and manage interim areas of the location until site receives a passing final inspection.

Corrective Action

Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

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

Final Land Use: _____

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 <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
	Fail					Slope Drain

Comment:	<p>See the "SUMMARY" section within the "Inspection Comment" at the beginning of this report for summary regarding slope stabilization issues.</p> <p>It was observed in this inspection that the slope drain on the southeast end of the Location is not in proper functioning condition; drain pipe has been cut halfway down slope; remaining pipe not in use is considered debris and requires removal. Slope drain has not been properly secured or constructed with an engineered outlet, which has resulted in stormwater degradation at the outlet.</p>					Date: 06/01/2022
Corrective Action:	<p>Comply with 1002.f; Install or repair slope drain in accordance with good engineering practices; and implement temporary stormwater and erosion control measures on the southern slopes to minimize further degradation and sediment transport by 3/25/2022.</p> <p>Repair and Reclamation of the degraded areas, and the installation/implementation of long term stormwater and erosion control measures will be required to be completed no later than 6/1/2022.</p>					

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
402982368	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5690973
696203470	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5690970