

**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:

09/29/2022

Submitted Date:

09/30/2022

Document Number:

696204147

FIELD INSPECTION FORMLoc ID 439690 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:

22 Number of Comments

3 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
O'Malley, Anna		anna.omalley@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	
Heil, John		john.heil@state.co.us	
Dupire, Matt		mdupire@blm.gov	BLM Meeker

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
316596	LOCATION	AC			-	Federal RGU 23-35-198	RI
439690	LOCATION	AC			-	Pitchers Mound Water Recycling Pit 13-35-198	RI
481438	CENTRALIZED EP WASTE MGMT FAC	AP	01/20/2022		-	Pitcher's Mound WRF	CI

General Comment:

On 9/29/2022, Reclamation Specialist Trujillo conducted a stormwater and construction inspection at TEP Rocky Mountain's Pitches Mound WRF location in Rio Blanco County, Colorado.

Construction of the Pitches Mount WRF has resulted in the expansion of the Federal RGU 23-35-198 Location (ID #316596). However, during the permitting/OGDP process, a second Location ID was created on this site (Pitches Mound Water Recycling Pit 13-35-198, #439690); the pit facility is currently related to two Location IDs existing at the same site.

It was observed in this inspection that soil salvage operations appear to have been completed; pit construction has not yet commenced.

Location/Pit facility constructed on Federal (BLM) surface.

The following compliance issues were observed during this inspection:

- Soil salvage
- Protection of soils
- Well signage

Refer to the "Location Construction", "Location" and "Reclamation" 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: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Rule 605.a Signage for the new location and construction installed at the southern location entrance. See photo 1.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	Permanent signage observed missing from the wells. See photo 21		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	10/30/2022
Type	OTHER		
Comment:	Form 2A Location permit posted within PVC tube, attached to the location sign, in accordance with Rule 406.c		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:	970-285-9377, Location sign 911 emergency		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:	Separator equipment has been relocated to the east end of the Location.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:	New tank facility in process of being installed at the northeast end of the location.				
Corrective Action:		Date:			

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Comment:		
Corrective Action:		Date:

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 439690 CDP: _____

Comment: With use of a sUAS, Reclamation Specialist calculated the disturbance area of the Location to be 15.37 acres; this comports with the Form 2A permitted disturbance area.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
		Material Handling And Spill Prevention	Yes

Comments: Erosion BMPs: Material handling and spill prevention BMPs observed at porta-john on Location.

Other BMPs: _____

Corrective Action: _____ Date: _____

WADDLES	Yes		
---------	-----	--	--

Comments: Erosion BMPs: Erosion logs (wattles) implemented along perimeter of the Location. BMP has been used in conjunction with other controls such as a perimeter stormwater diversion ditch, hydromulch and sediment traps. BMP appears to have been installed per good engineering requirements and is in proper functioning condition. See photo 7

Other BMPs: Erosion logs implemented at base of the two topsoil stockpiles; BMP implemented per good engineering requirements, and in proper functioning condition at time of inspection. See photos 12-13.

Corrective Action: _____ Date: _____

DITCHES	Yes		
Comments:	Erosion BMPs:	Stormwater diversion ditch constructed along the Location's perimeter; BMP has been constructed with appropriate slope and consolidation. Hydromulch has been used in conjunction with consolidation. See photo 7	
		It is noted however that sections of the ditch along the northwestern perimeter of the Location appears to be "too shallow", and may be an unintended point of discharge. See photos 8-9.	
	Other BMPs:	Erosion log velocity checks installed within ditch.	
Corrective Action:		Date:	
RETENTION PONDS	Yes		
Comments:	Erosion BMPs:	Sediment traps have been constructed at the north end of the Location, as well as on the northwest, northeast corner and southeast corners of the Location. BMPs appear to have been constructed in accordance with good engineering practices, with a properly engineered and armored inlets/outlets. See photos 10-11.	
	Other BMPs:		
Corrective Action:		Date:	
	No		
Comments:	Erosion BMPs:	Vehicle tracking BMPs not observed and location entrance, however sediment tracking/transport was not apparent at time of inspection.	
		Continue to monitor/manage sediment. Ensure BMPs are implemented and maintained per good engineering requirements so sediment transport/tracking is minimized.	
	Other BMPs:		
Corrective Action:		Date:	
	Yes		
Comments:	Erosion BMPs:	Hydromulch observed at the two topsoil stockpiles on the Location, as well as at the stormwater diversion ditch along the perimeter of the Location. BMP was intact and in proper functioning condition at time of inspection.	
	Other BMPs:		
Corrective Action:		Date:	
	Yes		
Comments:	Erosion BMPs:	Culvert installed at the northeastern location entrance; culverts observed onsite, though not yet installed at northwest entrance. See photos 4-6	
	Other BMPs:	Culvert(s) also not observed at southern entrance, though Stormwater Management Plan #402895189 does not identify that a culvert will be installed at this entrance. Topography within area may not warrant need for a culvert at this entrance.	
Corrective Action:		Date:	
	No		
Comments:	Erosion BMPs:	Overall construction of the Location is "in-process". BMPs to stabilize slopes of the Location (including cut slopes along the east end of the Location) will be required to ensure slopes remain protected, and to minimize erosion/degradation.	
	Other BMPs:		
Corrective Action:		Date:	

Comment: Soils throughout location loose and at risk to wind erosion. It was observed that operations on location ceased during exceptionally windy conditions to minimize fugitive dust per COAs. Operator also appears to be restricting traffic to compacted areas of the working pad and access road. Advise use of other BMPs, such as a water truck per Form 2A COAs, to further minimize wind erosion.

**Corrective
Action:**

Date:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities							
Facility ID:	<u>316596</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID:	<u>439690</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID:	<u>481438</u>	Type:	<u>CENTRALIZE</u>	API Number:	<u>-</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>

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 Fence installed along perimeter of the Location.

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____ Fail _____

Comment See "COGCC Comment" #1 at the end of this report.

Corrective Action _____

Operator is directed to conduct a review of topsoil salvage operations conducted on the Location during construction activities, to evaluate compliance with Rule 1002.b.(2). Operator shall submit their findings attached to a Form 4 to NW Reclamation Specialist Trujillo. Submittal of this plan does not constitute compliance with 1002.b.(2) topsoil salvage requirements, an additional evaluation by COGCC Staff will be made upon submittal of the information and COGCC observations.

Date 10/19/2022

1002c. PROTECTION OF SOILS _____ Fail _____

BMPs (erosion logs, hydromulch) implemented to minimize erosion, sediment transport, and to protect the topsoil stockpiles along the northwest and southeastern areas of the Location appear to be adequate, and in proper functioning condition at time of inspection.

However, it was observed that BMPs to minimize erosion and sediment transport from the remaining soil stockpiles throughout the Location were missing or insufficient. See photos 14-18.

Corrective Action _____

Implement BMPs per good engineering practices, in order to protect, minimize erosion, degradation and sediment transport from unstabilize soil stockpiles on the Location.

Date 10/03/2022

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 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 _____

Corrective Action _____ Date _____

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 ☐

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>10/5/2022- This portion of the Inspection Report is being amended in light of additional discoveries and compliance concerns. COGCC Reclamation Staff contacted Operator, and a meeting was conducted 10/4/2022.</p> <p>After additional review of the drone data, soil salvage discrepancies have become apparent:</p> <p>8.43 acres was disturbed on the west end of the Location during new construction activities; in accordance with Rule 1002.b.(2), at a minimum of 6 inches, 6,793 cubic yards of topsoil should have been salvaged and stored; this translates to a stockpile with 8,152 expected cubic yards due to a 20% swell factor. It has been observed that only 5,272 (4,219 CY pre-20% swell factor) cubic yards of topsoil was observed stored at the western topsoil stockpile.</p> <p>Operator does not appear to have salvaged to a depth of 6" per Rule requirements, and per conversations during the 8/16/2022 pre-construction site visit between Staff and Operator, and per the Operator's topsoil plan.</p>	trujilloam	10/05/2022

Attached Documents

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

Document Num	Description	URL
403183669	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874916
696204148	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874914