

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 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 FORM

 Loc 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 Pitchers Mound WRF location in Rio Blanco County, Colorado.

Construction of the Pitchers 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 (Pitchers 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.

**Location**

Overall 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		Date:	
Corrective Action:				

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	<input type="text"/>
Other (Content)	<input type="text"/>
Other (Capacity)	<input type="text"/>
Other (Type)	<input type="text"/>

**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		
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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: \_\_\_\_\_

<b>DITCHES</b>	Yes				
Comments: Erosion BMPs: <span style="color:red;">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</span>					
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: <span style="color:red;">Erosion log velocity checks installed within ditch.</span>					
Corrective Action:					Date:
<b>RETENTION PONDS</b>	Yes				
Comments: Erosion BMPs: <span style="color:red;">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.</span>					
Other BMPs:					
Corrective Action:					Date:
	No				
Comments: Erosion BMPs: <span style="color:red;">Vehicle tracking BMPs not observed and location entrance, however sediment tracking/transport was not apparent at time of inspection.</span>					
<span style="color:red;">Continue to monitor/manage sediment. Ensure BMPs are implemented and maintained per good engineering requirements so sediment transport/tracking is minimized.</span>					
Other BMPs:					
Corrective Action:					Date:
	Yes				
Comments: Erosion BMPs: <span style="color:red;">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.</span>					
Other BMPs:					
Corrective Action:					Date:
	Yes				
Comments: Erosion BMPs: <span style="color:red;">Culvert installed at the northeastern location entrance; culverts observed onsite, though not yet installed at northwest entrance. See photos 4-6</span>					
Other BMPs: <span style="color:red;">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.</span>					
Corrective Action:					Date:
	No				
Comments: Erosion BMPs: <span style="color:red;">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.</span>					
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: 316596 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 439690 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 481438 Type: CENTRALIZE API Number: - Status: AP Insp. Status: CI

**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

Comment 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 DISTRURBANCE 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? \_\_\_\_\_

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><b>COMMENT #1</b></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	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874916">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874916</a>
696204148	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874914">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5874914</a>