

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:

11/21/2022

Submitted Date:

11/29/2022

Document Number:

696204375

FIELD INSPECTION FORM

 Loc ID 482958 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:

16 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 |
|----------------|-------|------------------------------------|------------|
| Dupire, Matt | | mdupire@blm.gov | BLM Meeker |
| Heil, John | | john.heil@state.co.us | |
| | | john.noto@state.co.us | |
| Kubeczko, Dave | | dave.kubeczko@state.co.us | |
| , TEP | | COGCCInspectionReports@terraep.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|-----------------------|-------------|
| 482958 | LOCATION | AC | | | - | FEDERAL RG 11-13-298 | CI |
| 483227 | WELL | AP | 11/09/2022 | | 103-12581 | FEDERAL RG 523-13-298 | CI |
| 483228 | WELL | AP | 11/09/2022 | | 103-12582 | FEDERAL RG 321-13-298 | CI |
| 483229 | WELL | AP | 11/09/2022 | | 103-12583 | FEDERAL RG 522-13-298 | CI |
| 483230 | WELL | AP | 11/09/2022 | | 103-12584 | FEDERAL RG 423-13-298 | CI |
| 483231 | WELL | AP | 11/09/2022 | | 103-12585 | FEDERAL RG 324-12-298 | CI |
| 483232 | WELL | AP | 11/09/2022 | | 103-12586 | FEDERAL RG 524-12-298 | CI |
| 483233 | WELL | AP | 11/09/2022 | | 103-12587 | FEDERAL RG 424-12-298 | CI |
| 483234 | WELL | AP | 11/09/2022 | | 103-12588 | FEDERAL RG 24-12-298 | CI |
| 483235 | WELL | AP | 11/09/2022 | | 103-12589 | FEDERAL RG 331-14-298 | CI |
| 483236 | WELL | AP | 11/09/2022 | | 103-12590 | FEDERAL RG 423-12-298 | CI |
| 483237 | WELL | AP | 11/09/2022 | | 103-12591 | FEDERAL RG 21-13-298 | CI |
| 483238 | WELL | AP | 11/09/2022 | | 103-12592 | FEDERAL RG 323-13-298 | CI |
| 483239 | WELL | AP | 11/09/2022 | | 103-12593 | FEDERAL RG 34-11-298 | CI |
| 483240 | WELL | AP | 11/09/2022 | | 103-12594 | FEDERAL RG 421-13-298 | CI |
| 483241 | WELL | AP | 11/09/2022 | | 103-12595 | FEDERAL RG 23-13-298 | CI |
| 483242 | WELL | AP | 11/09/2022 | | 103-12596 | FEDERAL RG 521-13-298 | CI |

| | | | | | | | |
|--------|------|----|------------|--|-----------|-----------------------|----|
| 483243 | WELL | AP | 11/09/2022 | | 103-12597 | FEDERAL RG 22-13-298 | CI |
| 483244 | WELL | AP | 11/09/2022 | | 103-12598 | FEDERAL RG 434-11-298 | CI |
| 483245 | WELL | AP | 11/09/2022 | | 103-12599 | FEDERAL RG 523-12-298 | CI |
| 483246 | WELL | AP | 11/09/2022 | | 103-12600 | FEDERAL RG 334-11-298 | CI |
| 483247 | WELL | AP | 11/09/2022 | | 103-12601 | FEDERAL RG 422-13-298 | CI |
| 483248 | WELL | AP | 11/09/2022 | | 103-12602 | FEDERAL RG 322-13-298 | CI |

General Comment:

On 11/21/2022, Reclamation Specialist Trujillo conducted a construction and stormwater inspection at TEP's Federal/RG 11-13-298 Location in Rio Blanco County, Colorado.

The following compliance issues were observed during this inspection;

- Exceedence of the Permitted disturbance area
- Stormwater
- Protection of topsoil
- Stockpile Signage/Permit conditions

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: | Location signage and permit information located posted at the access road; location has since been constructed since the 9/29/2022 inspection; signage and permit information needs to be re-located to the Location entrance. | | |
| Corrective Action: | | Date: | |
| Type | OTHER | | |
| Comment: | Form 2A COA required signage at the topsoil stockpile; signage not observed per permit conditions. | | |
| Corrective Action: | Install singage at topsoil stockpile. | Date: | 12/28/2022 |

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

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: |

Location Construction

Location ID: 482958 CDP: _____

Comment: Pursuant to Form 2A #402932455, the permitted size of disturbance for the Location during construction is 8.15 acres. With the use of a sUAS, it was observed that the disturbance area of the Location is 8.46 acres; this exceeds the Oil and Gas Location Assessment's permitted disturbance area. OGLA included for notification purposes.

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action:

Date: _____

Wildlife BMPs:

Comment:

Corrective Action:

Date: _____

Stormwater:

| | | | |
|--------------|---------|------------|---------|
| Erosion BMPs | Present | Other BMPs | Present |
| | No | | |

Comments: Erosion BMPs:

Other BMPs:

Corrective Action: Date: 12/13/2022

| | | | |
|---------|-----|--|--|
| WADDLES | Yes | | |
|---------|-----|--|--|

Comments: Erosion BMPs:

Other BMPs:

Corrective Action: Date:

| | | | |
|-----------------|-----|--|--|
| RETENTION PONDS | Yes | | |
|-----------------|-----|--|--|

Comments: Erosion BMPs:

Other BMPs:

Corrective Action: Date:

| | | | |
|--|----|--|--|
| | No | | |
|--|----|--|--|

Comments: Erosion BMPs:

Other BMPs:

Corrective Action: Date:

| | | | |
|---------|-----|--|--|
| DITCHES | Yes | | |
|---------|-----|--|--|

Comments: Erosion BMPs:

Other BMPs:

Corrective Action: Date:

Comment:

Corrective Action: **Date:**

On Site Inspection (305):

Surface Owner Contact Information:

Name: Address:

Phone Number: Cell Phone:

Inspector Name: Trujillo, Aaron

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>482958</u> | Type: <u>LOCATION</u> | API Number: <u>-</u> | Status: <u>AC</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483227</u> | Type: <u>WELL</u> | API Number: <u>103-12581</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483228</u> | Type: <u>WELL</u> | API Number: <u>103-12582</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483229</u> | Type: <u>WELL</u> | API Number: <u>103-12583</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483230</u> | Type: <u>WELL</u> | API Number: <u>103-12584</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483231</u> | Type: <u>WELL</u> | API Number: <u>103-12585</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483232</u> | Type: <u>WELL</u> | API Number: <u>103-12586</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483233</u> | Type: <u>WELL</u> | API Number: <u>103-12587</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483234</u> | Type: <u>WELL</u> | API Number: <u>103-12588</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483235</u> | Type: <u>WELL</u> | API Number: <u>103-12589</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483236</u> | Type: <u>WELL</u> | API Number: <u>103-12590</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483237</u> | Type: <u>WELL</u> | API Number: <u>103-12591</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483238</u> | Type: <u>WELL</u> | API Number: <u>103-12592</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483239</u> | Type: <u>WELL</u> | API Number: <u>103-12593</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483240</u> | Type: <u>WELL</u> | API Number: <u>103-12594</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483241</u> | Type: <u>WELL</u> | API Number: <u>103-12595</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483242</u> | Type: <u>WELL</u> | API Number: <u>103-12596</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483243</u> | Type: <u>WELL</u> | API Number: <u>103-12597</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |
| Facility ID: <u>483244</u> | Type: <u>WELL</u> | API Number: <u>103-12598</u> | Status: <u>AP</u> | Insp. Status: <u>CI</u> |

| | | | | |
|---------------------|------------|-----------------------|------------|------------------|
| Facility ID: 483245 | Type: WELL | API Number: 103-12599 | Status: AP | Insp. Status: CI |
| Facility ID: 483246 | Type: WELL | API Number: 103-12600 | Status: AP | Insp. Status: CI |
| Facility ID: 483247 | Type: WELL | API Number: 103-12601 | Status: AP | Insp. Status: CI |
| Facility ID: 483248 | Type: WELL | API Number: 103-12602 | Status: AP | Insp. Status: CI |

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: RANGELAND, RECREATIONAL

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment Excluding areas of the topsoil stockpile, 7.87 acres have been disturbed. It was observed in this inspection that 10,306.22 cubic yards of topsoil has been stored on the south end of the Location. This equates to ~8,245 cubic yards of topsoil being salvaged over the disturbance area (pre-20% swell factor), at an average depth of 7.8 inches. Per the Topsoil Protection Plan #403047572, topsoil depth on the Pad Location ranged from 5" (adjusted to 6" per minimum requirements) to 10", resulting in an average depth of 7.5 inches. Based on this information, Operator appears to have met COGCC 1002.b.(2) soil salvage requirements.

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS Fail

Comment It was observed in this inspection that BMPs to protect and stabilize the topsoil stockpiles on the south end of the Location are missing or insufficient; soils exposed and at risk to wind and water erosion. Additionally, stockpiles have been constructed larger than generally recommended, resulting in steep and unstabilized slopes. A CA date of "date of inspection" is being provided, as topsoil salvage operations have completed on the Location, and BMPs should have been implemented at that time.

Corrective Action Comply with Rule 1002.c, 1002.f and Form 2A Permit conditions; implement BMPs to stabilize the topsoil stockpiles, as well as to protect from wind and water erosion.

Date 11/21/2022

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 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, RECREATIONAL _____

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: Pad construction in process at time of inspection. Operator has constructed location with steep slopes. This is not advised as grade will create slope stabilization challenges. Cut/fill slopes are a mix of large rocky material, and finer soils.

Upon completion of pad construction, BMPs to stabilize, minimize erosion and degradation will be required at the cut and fill; SWMP #403047575 states that "cut and Fill slopes will be hydro-mulched following site construction"; hydro-mulching alone may be inadequate to stabilize slopes.

See "STORMWATER COMMENT #2" at the end of this report for additional comments.

Corrective Action: Date: _____

Pits: NO SURFACE INDICATION OF PIT

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

Lining:

Liner Type: _____ Liner Condition: _____

Comment: Form 2A Location drawings identifies a Cuttings Trench on the northern areas of the Location; Cuttings trench construction observed "in process" at time of inspection.

A Form 15 is required to be submitted within 30 days of constructing the cuttings trench.

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:

Corrective Action Date: _____

COGCC Comments

| Comment | User | Date |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|------------|
| <p>STORWMATER COMMENT #2</p> <p>Per figures included with the Form 2A permit, a "Trench Backfill" stockpile will be located on the north end of the Location. SWMP #403047575 states that stockpile will be hydro-mulched following completion of construction; trench and stockpile construction in process at time of inspection. Erosion logs currently only perimeter control at base of the slopes; stormwater diversion ditch only constructed along the southwestern, western and northwestern perimeter of the Location.</p> <p>Due to the site's conditions observed at the stockpile (size/grade of the slopes, the size of the fill material- large rocky material mixed with finer soils), hydro-mulching in conjunction with erosion logs may be inadequate to stabilize the slopes, to adequately manage runoff and to minimize erosion, degradation and sediment transport.</p> | trujilloam | 11/28/2022 |
| <p>STORWMATER COMMENT #1</p> <p>Stormwater Management Plan ("SWMP") #403047575 identifies three (3) outlet points to allow for stormwater to discharge from the working pad area of the Location, to the stormwater diversion ditch or a sediment trap along the perimeter.</p> <p>It was observed in this inspection that only one engineered outlet has been constructed, allowing for discharge into a sediment trap on the east end of the Location. No engineered outlets have been constructed on the northern/northwestern, or southern/southwestern end of the Location in order to allow for discharge per the SWMP; construction activities within areas the outlets were to be located appears to be completed.</p> | trujilloam | 11/28/2022 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 403242551 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5926762 |
| 696204376 | Photos, Annotation and Issues report | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5926750 |