

**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:

11/23/2022

Submitted Date:

12/05/2022

Document Number:

702800968**FIELD INSPECTION FORM**Loc ID: 311677 Inspector Name: O'Malley, Anna 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

4 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
Kellerby, Shaun		shaun.kellerby@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	All Inspections
Ramsey, Scott		scott.ramsey@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
311677	LOCATION	AC			-	HARRIS-67S94W 5SWNE	RI
311678	LOCATION	AC			-	HARRIS-67S94W 5SWNE	RI
334779	LOCATION	AC			-	HARRIS-67S94W 5SWNE	RI

General Comment:

On 11/23/2022, Reclamation Specialist O'Malley conducted an interim reclamation and stormwater inspection at TEP ROCKY MOUNTAIN LLC's HARRIS-67S94W/5SWNE Location #311677 in Garfield County, Colorado.

This is a follow up to inspection document #700703880, #692700034 and #700700789. Corrective actions have not been addressed.

The following compliance issues were observed during this inspection:

- Unmarked guy line anchors
- Storage of Surface Owner equipment: no variance observed
- Interim Reclamation not performed
- Stormwater: cut slope eroding

Refer to the "Location," "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	STORAGE OF SUPL		
Comment:	<p>Previous inspection observed storage of equipment throughout the location. Inspector required Operator to remove stored equipment. Operator submitted FIRR #402964624 indicating Rule 606 does not apply to land owners.</p> <p>It was observed in this inspection that equipment is stored throughout the location. Per Rule 606.a(2) an Operator may request a variance pursuant to Rule 502 for a Surface Owner to use portions of the Oil and Gas Location, provided such use does not interfere with safe operations, access to equipment, Reclamation requirements, or emergency response capabilities. Such use cannot cause degradation to the site.</p> <p>No variance request observed. Corrective action from inspection #700703880 remains applicable.</p>		
Corrective Action:	Remove all stored equipment.	Date:	04/29/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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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:	<u>311677</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>311678</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>334779</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

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 [Refer to the "Location" section of this inspection report.](#)

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment [Refer to the "Location" section of this inspection report.](#)

Corrective Action _____

Date _____

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

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? FailComment [Six \(6\) guy line anchors observed to be unmarked or markers in disrepair.](#)Corrective Action [Install proper guy line markers per Rule 1003.a or remove anchors if unnecessary equipment.](#)Date **12/14/2022**

- 1003b. Area no longer in use? Fail Production areas stabilized ? _____
- 1003c. Compacted areas have been cross ripped? Fail
- 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? Fail
- Production areas have been stabilized? _____ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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

It was observed in this inspection that interim reclamation has not been performed. Areas at the northwest, north and northeast of the location do not appear to be necessary for production operations and have not been reclaimed.

It appears that equipment stored throughout the location will interfere with required interim reclamation. Refer to the "Location" section of this inspection report.

Corrective Action

Comply with 1003 Rules. Conduct interim reclamation on the Location including, but not limited to: compaction alleviation (cross ripping to a minimum depth of 18 inches), recontouring/regrading, replacement of topsoil, and revegetation activities; use a seed mixture provided by the surface owner, or a mixture prescribed by the local soil conservation district. Implement control measures to stabilize the seeded soil in accordance with Rule 1002.f.(2)C. Revegetation activities shall be completed no later than 5/1/2023.

Date 05/01/2023Overall Interim Reclamation Fail**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 ☐Multi-Well Location ☐**Storm Water:**

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

Comment: Refer to the "COGCC Comments" section of this inspection report for "Stormwater Comments"

Corrective Action: Install or repair required BMPs per Rule 1002.f. Continue to monitor and manage stormwater on the Location. Ongoing stormwater management is required until the site receives a passing final inspection.

Date: 05/28/2020

Pits: ☒ NO SURFACE INDICATION OF PIT**COGCC Comments**

Comment	User	Date
<p>Stormwater Comments</p> <p>Previous inspections observed the cut slope eroding. Inspectors required Operator to stabilize the cut slope.</p> <p>Operator submitted FIRR #402408095 indicating "CA COMPLETED" 5/28/2020 "The cut slope is directly behind the separators and there is no way to stabilize the slope until final reclaim of the location. Any additional disturbance of the slope will further destabilize the slope and could result in greater harm than benefit. This is not a storm water issue / violation, nor is this a safety issue. TEP monitors and inspects all locations continuously and performs maintenance as needed to maintain safe operations. No further actions are planned."</p> <p>It was observed in this inspection that the cut slope at the south and east of the location continues to actively erode. Pedestals, exposed plant roots, undercutting into adjacent reference areas and falling rocks are evidence of actively eroding soils. Loose, unconsolidated, unprotected, eroding soils act as a sediment source and stormwater pollutant. Falling rocks pose a safety hazard. Photos from past inspections show additional rocks continue to fall from the slope. BMPs to minimize erosion, transport of sediment offsite and site degradation were not observed. A new corrective action and date is given based off the date in FIRR 402408095 the TEP indicated CA Completed. Additional degradation continues to occur since submittal of the FIRR.</p>	omalleya	12/05/2022

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

Document Num	Description	URL
403250269	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5933549
702801005	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5933547