

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:

12/05/2023

Submitted Date:

12/06/2023

Document Number:

696205436

FIELD INSPECTION FORM

Loc ID 322524 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:

14 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
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		dlee@nngus.com	
, TEP		COGCCInspectionReports@terraep.com	All Inspections
		dlee@nng.us.com	
		siera.schroeder@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
322524	LOCATION	AC			-	Puckett MV 1-23	CI
453726	LOCATION	AC			-	CSOC TB Location	CI
453727	TANK BATTERY	AC			-	CSOC 697-14 Tank Battery	CI

General Comment:

On 12/5/2023, Reclamation Specialist Trujillo conducted a construction and stormwater inspection at TEP Rocky Mountain's Puckett/MV 1-23, and Nonsuch's CSOC TB location in Garfield County, Colorado.

TEP P&Ad the MV 1-23 well on 8/26/2013, and conducted reclamation of areas no longer necessary on the Location, leaving the remaining working pad surface for the Nonsuch's CSOC TB facility (Metershed, Separator equipment, 200 bbl condensate tank); Nonsuch was the last active Operator on the Location, and was therefore responsible for management of the remaining Location at this time.

On 9/22/2023, TEP received approval on Form 4 #403318897 to re-disturb the Location for temporary use as a Frac Pad use during completion operations related to the Arco Deep 1-27 Pad; construction activities commenced 10/13/2023 per Form 42 #403556580.

Previous inspections observed that all of Nonsuch's production equipment, with exception to the Metershed, has been removed. Pursuant to document attached to the Form 4 Sundry, the remaining Nonsuch Sales Meter associated with the Facility is to be relocated off of the working pad surface, to areas southwest of the Location.

At time of inspection Nonsuch's facility has not been closed, and the equipment has not been removed, therefore both Operators remain associated with the Location; this inspection is being submitted to both Nonsuch and TEP.

This inspection is a followup to previous inspections related to Nonsuch Natural Gas' CSOC TB Location #453726, and NOAV #403100223, to document compliance with the following Corrective Actions:

-Stormwater

This inspection is also a follow-up to #696205408 submitted to both Operators, to determine compliance with the following corrective actions:

- Trash
- Monitoring well documentation
- Facility Closure requirements
- Stormwater

It was observed in this inspection that the Location(s) remain out of compliance with ECMC Rules and Corrective Actions.

Refer to the "Location" 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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Location signage		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:	970-285-9377 / 911	
Corrective Action:		Date: _____

Good Housekeeping:

Type	TRASH		
Comment:	Previous inspection observed trash debris along the fill slopes and berms of the Location. Inspection required Operator to comply with Rule 606. It was observed in this inspection that the trash appears to have been removed.		
Corrective Action:		Date:	

Overall Good: ☒**Spills:**

Type	Area	Volume		
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In Containment: No

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

			corrective date
Type: Gas Meter Run	#		
Comment:	Pursuant to documents attached to Form 4 #403318897, the existing Nonsuch sales meter associated with the Nonsuch CSOC Tank Battery Facility it to be removed from the working pad surface, and relocated to adjacent areas southwest of the Location; records show equipment previously associated with the battery facility include the meter identified above, separator equipment and a 200 bbl condensate tank. Previous inspection required Operator(s) to comply with Rule 911 for facility closure, and 1105. Unable to find records that the required Forms for closure has been submitted. CA remains applicable.		
Corrective Action:	Comply with Rule 911 and submit a Form 27 for O&G facility closure. Comply with 1105 for Flowline abandonment requirements, including the Form 42 – Abandonment of Flowlines notice.		Date: 11/06/2023
Type: Other	# 1		
Comment:	Pursuant to documents attached to Form 4 #403318897, the above-ground marker associated with the P&A well will be cut off below grade per Rule 434. It was observed in this inspection that the marker has been removed at the surface.		
Corrective Action:		Date:	
Type: Other	#		

Comment:	<p>Pursuant to documents attached to the approved Form 4 #403318897, an existing monitoring well (#658) is located along the southeastern end of the Working Pad Surface.</p> <p>Previous inspection noted that monitoring well was not apparent, and it was unclear as to what the current status of the well is. Inspection required Operator to submit documentation regarding the status of the well.</p> <p>Unable to find records that the required documentation has been provided. CA remains applicable.</p>	
Corrective Action:	Provide (attached to a Form 4) ECMC with an update/information/documentation regarding the current status of this monitoring well; if monitoring well has been P&A, provide records that well was properly P&A per DWR requirements.	Date: 11/06/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID:	322524	CDP:	
Comment:			
Corrective Action:			Date:

Form 2A COAs:

Comment:			
Corrective Action:			Date:

Wildlife BMPs:

Comment:			
Corrective Action:			Date:

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
	Yes		

Comments:	<p>Erosion BMPs: Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, a "Drive-Over Berm" to contain stormwater runoff on the WPS will be constructed at the Location entrance, at the top of the "Ramp Road onto Pad".</p> <p>Previous inspection observed that the BMP had not been constructed, and required Operator to comply with the Form 4 SWMP.</p>
	<p>Other BMPs: Limited visibility due to snow cover, however it appears additional contour work has been performed at the Location entrance.</p> <p>A followup inspection will be required once visibility improves, however CA is being considered resolved at this time.</p>
Corrective Action:	
Date:	

WADDLES	Yes		
Comments: Erosion BMPs:		Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, erosion logs (straw wattles) have been implemented along the perimeter of the Location's disturbance, and the topsoil stockpile on the north end of the Location.	
Other BMPs:			
Corrective Action:		Date:	
	Yes		
Comments: Erosion BMPs:		Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, "Hydromulching without seed" will be implemented at slopes along the perimeter of the Location. Previous inspection observed slopes lacked stabilization and required Operator to comply with the Form 4 SWMP.	
Other BMPs:		Limited visibility due to snow cover, however it appears slopes have been hydromulched per the SWMP. CA has been resolved.	
Corrective Action:		Date:	
Comment:			
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:	322524	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI
Facility ID:	453726	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI
Facility ID:	453727	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	CI

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 Limited visibility due to snow cover; a follow-up inspection will be conducted once conditions improve to determine compliance with Rule 1002.b.

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? _____

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: _____

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: [See "COGCC Comments" at the end of this report.](#)

Corrective Action: [Install or repair required BMPs per Rule 1002.f.\(2\)C. Ensure control measures are installed in accordance with good engineering practices, and maintained in proper functioning condition.](#)

Date: 07/20/2021

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Previous inspections (#696201797; #696201822; #696201988; #696202916; #696203087; #696203324; #696203532; #696204030; #696204553) observed that BMPs to protect and stabilize unpaved areas of the Location and access road, and to allow for proper stormwater discharge in a manner that minimizes erosion, degradation and sediment transport are missing, or insufficient; stormwater runoff resulted in erosion degradation and offsite sediment discharge at Location entrance and access road.</p> <p>Inspections required Nonsuch Natural Gas Inc. to comply with Rule 1002.f.(2)C, as Nonsuch was the last active Operator on the Location.</p> <p>NOAV #403100223 was issued 07/08/2022 also requiring compliance with Rules and corrective actions.</p> <p>Inspection #696205408 observed that though stormwater issues on the working pad surface have been repaired during recent TEP construction activities, stormwater issues along the access road were not been addressed.</p> <p>Limited visibility due to snow cover, however, no resolution with supporting documentation has been submitted by Operator(s) to show corrective actions have been taken. Additionally, it was observed in this inspection that the rill/gully erosion issues along the access road remain apparent. Work to address the degradation issues does not appear to have been performed prior to recent storm events.</p> <p>This CA will remain applicable.</p>	trujilloam	12/06/2023

Attached Documents

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

Document Num	Description	URL
403616935	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347868
696205437	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347813