

**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:

03/18/2024

Submitted Date:

03/19/2024

Document Number:

696205682

FIELD INSPECTION FORM

Loc ID 316441 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

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

Operator Information:

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:

Contact Name	Phone	Email	Comment
Heil, John		john.heil@state.co.us	
Roberts, James		j75rober@blm.gov	Rio Blanco, Moffat
Arthur, Denise		denise.arthur@state.co.us	
,		COGCCInspectionReports@terraep.com	TEP

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
316441	LOCATION	AC			-	FEDERAL 299-23-3	RI
482602	WELL	IJ	08/15/2023	DSPW	103-12564	Federal RG 912-23-299D	RI

General Comment:

On 3/18/2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountain's FEDERAL/299-23-3 location in Rio Blanco County, Colorado.

Location is Federal Surface and Federal Minerals.

The following compliance issues were observed during this inspection:

- Stormwater
- Good Housekeeping
- Management of E&P Waste

Refer to the "Location", "Environmental", "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 inspection that have not been addressed are still applicable.

Location

Overall Good:

Signs/Marker:

Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location Signage		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

Corrective Action:

Date:

Good Housekeeping:

Type	DEBRIS		
Comment:	Trash debris (Unused signage, erosion logs) observed on the southern interim areas.		
Corrective Action:	Comply with 606 Rules	Date:	03/26/2024

Overall Good:

Spills:

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:

Type:	#		corrective date
Comment:	No other production equipment onsite.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 316441 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 482602 Type: WELL API Number: 103-12564 Status: IJ Insp. Status: RI

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
Drill Cuttings		Inadequate		
Comment	See "COGCC Comments" at the end of this report for comment regarding "Drill Cuttings Management".			
Corrective Action	Comply with Form 27 #403449457 Conditions of Approval. Submit an updated Form 27 demonstrating compliance with Table 915-1; submit all analytical data associated with the management and treatment of cuttings on location.			Date: 03/22/2024

Spill/Remediation:

Comment:

Corrective Action: Date:

Emission Control Burner (ECB):

Comment:

Pilot: Wildlife Protection Devices (fired vessels):

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 _____

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 [See "Good Housekeeping"](#).

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 [Anchors not observed on Location.](#)

Corrective Action _____

Date _____

1003b. Area no longer in use? Pass Production areas stabilized ? _____
1003c. Compacted areas have been cross ripped? _____
1003d. Drilling pit closed? _____ Subsidence over on drill pit? _____
Cuttings management: See "Environmental" and COGCC Comments.

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? Fail Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

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

Non-Cropland

Top soil replaced Pass Recontoured Pass 80% Revegetation In

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 of areas not reasonably needed for production has been performed on the Location; Operator appears to have conducted work including recontouring/regrading, replacement of soils and revegetation activities; hydromulch to stabilize soils observed. Form 45 #403506313 per Rule 407 currently in process.

See the "Environmental" and "COGCC Comments" section of this report regarding management of drill cuttings.

Corrective Action

Date _____

Overall Interim Reclamation In Process

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
Hydro Mulch						
Compaction	Fail					
Waddles						
Retention Ponds						Western interim
Ditches						
Sediment Traps						Southern interim areas
Rip Rap						Inlets- unclear if adequate
Slope Roughening						
Gravel						

Comment: It was observed in this inspection that stormwater and erosion control measures are missing or insufficient on the Location:

--BMPs to stabilize the working pad surface and access road are no longer in proper functioning condition; control measures to minimize tracking inadequate; control measures to minimize off-site sediment transport by equipment, such as a vehicle tracking pad, also not observed.

Erosion logs along perimeter of the disturbance have filled with sediment.

Additional comments- inlet at sediment trap on the southern interim areas does not appear to be adequate in size; armoring has only been placed along ~5 feet of the inlet, rather than the entire slope leading into the basin.

Corrective Action: **Comply with Rule 1002.f** Date: 03/21/2024

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>DRILL CUTTINGS MANAGEMENT</p> <p>Pursuant to the approved WMP (#402997571) drill cuttings generated on the Location are to be buried against the cut slope of the pad during reclamation.</p> <p>Operator submitted Form 27(i) #403449457 (Remediation Proj. #33103) for the management of the drilling cuttings. The Form 27 also indicates that cuttings will be utilized on Location as fill material. Form 27(i) was approved with the following condition: "Operator shall submit all analytical data associated with the management and treatment of cuttings on location".</p> <p>It was observed in this inspection that Operator has performed interim reclamation on the Location, including the cuttings area on the northeast end of the Location; Operator appears to have buried the drill cuttings.</p> <p>Unable to find submission records of a subsequent Form 27 for the remediation of the drill cuttings, including analytical data as required by Form 27(i) COA.</p> <p>Operator has not demonstrated that drill cuttings comply with Table 915-1, therefore cuttings are still considered "Oily Waste"; Operator appears to have buried drill cuttings on the Location prior to receiving approval on a Form 27. Pursuant to Form 27(i) #403449457, Highest SAR concentration 36.9; Operator appears to have buried materials with elevated inorganic concentrations prior to receiving an approved 915.b request</p>	trujilloam	03/19/2024

Attached Documents

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

Document Num	Description	URL
403725096	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6473555
696205683	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6473545