

**FORM
INSP**

Rev
X/15

**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:

04/03/2019

Submitted Date:

05/29/2019

Document Number:

690900061

FIELD INSPECTION FORM

Loc ID 421192 Inspector Name: FISCHER, ALEX On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

OGCC Operator Number: 96850
Name of Operator: TEP ROCKY MOUNTAIN LLC
Address: PO BOX 370
City: PARACHUTE State: CO Zip: 81635

Findings:

- 14 Number of Comments
- 8 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
Arauz, Steven		steven.arauza@state.co.us	
Gardner, Mike		mgardner@terraep.com	
Heil, John		john.heil@state.co.us	
Colby, Lou		lou.colby@state.co.us	
Rocky, TEP		COGCCInspectionReports@terraep.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
414560	PIT	AC			-	44-16-694	EI

General Comment:

On April 3, 2019 COGCC Environmental Staff (Alex Fischer, Steven Arauz, and John Heil) conducted a field inspection of TEP Rocky Mountain LLC (TEP) Pit Facility ID: 414560. Weather was overcast and temperature app 50 degree F. See the Inspectors/Comments tab.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	OTHER		
Comment:	Entrance sign in incorrect and reads "OGCC Pit Number: 421192. Note, this is the Location ID Number and the Pit Facility Number is 414560.		
Corrective Action:		Date:	
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Valves, pipes, pails, near manifold and ASTs.		
Corrective Action:	Comply with Rule 603.f .	Date:	<u>05/29/2019</u>
Type	DEBRIS		
Comment:	Straw bale debris near entrance to the Pit Facility.		
Corrective Action:	Comply with Rule 603.f .	Date:	<u>06/09/2019</u>
Overall Good: <input type="checkbox"/>			
Spills:			
Type	Area	Volume	
Other	Truck Loadout		
Comment:	Staining of gravel beneath pipe covered with plastic sheeting and duct tape.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 906.a.	Date:	<u>05/29/2019</u>
In Containment: No			
Comment:			
<input type="checkbox"/> Multiple Spills and Releases?			
Fencing/:			
Type	PIT		
Comment:	An approximate 3-foot hole in fencing/netting.NOTE: This was repaired on 4/3/2019. Other gaps in fencing/netting around pipe penetrations noted.		
Corrective Action:	Net or fence pit to prevent access per rule 902.d. NOTE: This was repaired on 4/3/2019.	Date:	<u>05/31/2019</u>
Venting:			
Yes/No			
Comment:			
Corrective Action:		Date:	
Flaring:			
Type			
Comment:			

Corrective Action:	Date:
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Inspected Facilities

Facility ID: 414560 Type: PIT API Number: - Status: AC Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: OTHER E&P WASTE Estimated Spill Volume: _____

Comment:

- Gravel discoloration and apparent drip from pipe with plastic sheeting and duct tape.
- Gravel discoloration near 5-gallon pail.

Corrective Action: Control and contain spills/releases and clean up per Rule 906.a. Date: 05/29/2019

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well Complaint:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____ Comment: _____

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Other	In Process					

Comment: Erosional rills and failed stormwater BMPs along hillside outside and north of the pit facility. Migration of sediments into the pit.

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: 05/29/2019

Pits: NO SURFACE INDICATION OF PIT

Type: Multiwell Reuse/ Recycling Lined: YES Pit ID: 414560 Lat: 39.520530 Long: -107.888400

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: HDPE Liner Condition: Adequate

Comment: Three 12-inch bubbles noted in the liner along the west side of pit.

Corrective Action

Date:

Fencing:

Fencing Type: Netting/Fence com Fencing Condition: Inadequate

Comment: Gaps in wire strand fence near southeast corner. Entrance gate open.

Corrective Action

Net or fence pit to prevent access per rule 902.d.

Date: 06/05/2019

Netting:

Netting Type: Fence/Net Combo Netting Condition: Gaps

Comment: Gaps in net around pipe penetrations.

Corrective Action

Net or fence pit to prevent access per rule 902.d.

Date: 06/05/2019

Anchor Trench Present: YES Oil Accumulation: YES 2+ feet Freeboard: YES

Comment:

Corrective Action

Date:

Permit:	Facility ID	Permit Num	Expiration Date
	414560	1631035	
	414560	1631035	

Monitoring:	Monitoring Type	Comment
	None	No leak detection monitoring observed.

COGCC Comments

Comment	User	Date
<p>On April 3, 2019 COGCC Environmental Staff (Alex Fischer, Steven Arauza, and John Heil) conducted a field inspection of TEP Rocky Mountain LLC (TEP) Pit Facility ID: 414560. Weather was overcast and temperature app 50 degree F.</p> <p>The following is a summary:</p> <ul style="list-style-type: none"> • The Clough Production Pit is an approximate 117,800 bbls produced water pit; • Access gates where open at the time of the inspection; • Entrance sign in incorrect and reads "OGCC Pit Number: 421192. Note, this is the Location ID Number and the Pit Facility Number is 414560; • A four strand barbed wire fence surrounds the pit facility complex; • A 10 foot fire lane and 10 foot buffer lane are absent; • A pump trailer present with hoses being supported by poly pipe supports and a concrete block; • Temporary cribbing of wood blocks support the manifold system; • Unused equipment near the manifold system (valve with piping) and near the ASTs; • Hosed placed directly on pit liner; • At the time of the inspection, fluids were flowing into the pit facility; • Booms on fluid surface with hydrocarbon sheen; • Gaps (6-8 inches) in netting/fencing at poly pipe penetrations; • Three approximate 12-inch size bubbles in pit liner on the west side of the pit complex; • Metal trash/debris noted in southwest corner of pit facility; • Potential migration of sediment into the pit facility throughout the entire pit facility; • An approximate 2-3 foot gap in the fence beneath the lower wire in the southwest corner of the pit facility; • Unused equipment near the pump trailer and ASTs; • Erosional rills and failed stormwater BMPs along hillside outside and north of the pit facility; • An approximate 3-foot hole in fence/netting in northwest corner pf the pit facility (Note, the operator was contacted via phone on 4/3/2019 and repairs made on that same day); • An approximate 300-gallon AST and 1000-gallon AST inside of secondary containment; • Gravel discoloration and apparent drip from pipe with plastic sheeting and duct tape; • Gravel discoloration near 5-gallon pail; • Apparent used BMPs) straw bales stored outside of the pit facility about 50-feet from the entrance. <p>No leak detection monitoring was observed.</p>	fischera	05/29/2019

Attached Documents

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

Document Num	Description	URL
690900062	INSP Photo Clough Production Pit Facility 414560 20190403	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4834561