

**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:

06/05/2020

Submitted Date:

06/10/2020

Document Number:

696201365

**FIELD INSPECTION FORM**Loc ID 475753 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: PO BOX 370

City: PARACHUTE State: CO Zip: 81635

**Status Summary:**

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

**Findings:**

12 Number of Comments

5 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
, TEP		COGCCInspectionReports@terraep.com	
Byers, Jim		jbyers@blm.gov	Mesa, Garfield, Gunnison

**General Comment:**

On 6/05/2020 and 6/09/2020, Reclamation Specialist Trujillo conducted a pre-drill construction and stormwater inspection at TEP Rocky Mountain's Federal /PA 31-26 Location in Garfield County, Colorado.

A SUA was utilized to measure the location to determine compliance with 1002 Rules.

The following compliance issues were observed during this inspection:

1002.f: Stormwater

1002.b.(2) Soil removal and segregation on non cropland

603.f: Debris

Refer to the "Construction", "Good Housekeeping", "Reclamation" and Stormwater" section 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 on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	DEBRIS		
Comment:	During grubbing operations, Operator appears to have placed/piled woody vegetation on areas north of the Location, and on the south end of the pad.  This is considered debris and needs to be properly removed and disposed.		
Corrective Action:	Comply with 603.f	Date:	06/25/2020

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

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

Yes/No

Comment: Corrective Action: Date: **Flaring:**

Type		
Comment:	<input type="text"/>	
Corrective Action:	<input type="text"/>	Date: <input type="text"/>

**Location Construction**

Location ID: 475753

CDP: 

Comment: A total disturbance area of ~3 acres was mapped on 6/5/2020; this appears to be in compliance with the approved Form 2A for the permitted disturbance area.

Corrective Action: Date: **Form 2A COAs:**Comment: Corrective Action: Date: **Wildlife BMPs:**Comment: Corrective Action: Date: **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
--------------	---------	------------	---------

	No		No`
Comments: Erosion BMPs:	It was observed in this inspection that construction activities of the Pad appear to have concluded; Soils on the cut and fill slopes, as well as the soil stockpile on the south end of the Location, do not appear to be protected or stabilized in accordance with Rule 1002.f, and 1002.c; BMPs missing or insufficient.		
Other BMPs:	Erosion degradation evident on cut slopes on the north and west end of the Location		
Corrective Action: Install or repair required BMPs to stabilize slopes/soils per Rule and 1002.c and 1002.f.(2)C		Date: 06/25/2020	
WADDLES	Yes		
Comments: Erosion BMPs:	It was observed in this inspection that Operator has implemented straw bale, and straw wattle BMPs along the perimeter of the Location, and soil stockpile. BMPs along the perimeter of the pad appear to have been installed in accordance with good engineering practices. BMPs at base of soil stockpile no longer in proper functioning condition; See below.		
Other BMPs:	Erosion evident at the soil stockpile; Sediment transport has filled and/or covered portions of Hay bale BMPs.  Haybale BMP along areas of the access road ~50 south of soil stockpile BMP is not in proper functioning condition; Stormwater appears to have cut under the BMP.  BMPs requires maintenance.		
Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C		Date: 06/25/2020	
	No		
Comments: Erosion BMPs:	BMPs appear missing, or insufficient to stabilize access road at stream crossing		
Other BMPs:			
Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C		Date: 06/25/2020	
		Material Handling And Spill Prevention	Yes`
Comments: Erosion BMPs:	Fuel container observed on Location with proper containment.		
Other BMPs:			
Corrective Action:		Date:	
	Yes		
Comments: Erosion BMPs:	Soils on the Location and access road loose and powdery; Per 2A COA #5, a water truck was observed on site, and in use on the access road for Fugitive dust control measures. Continue BMPs for fugitive dust control.		
Other BMPs:			
Corrective Action:		Date:	
<u>Comment:</u>			
<u>Corrective Action:</u>			<u>Date:</u>
<b>On Site Inspection (305):</b>			
<u>Surface Owner Contact Information:</u>			
Name:	Address:		
Phone Number:	Cell Phone:		
<u>Operator Rep. Contact Information:</u>			

Inspector Name: Trujillo, Aaron

Landman Name: _____	Phone Number: _____
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____
Request LGD Attendance: _____	
<u>LGD Contact Information:</u>	
Name: _____	Phone Number: _____
	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>	
<u>Summary of Operator Response to Landowner Issues:</u>	
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>	

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

[See "COGCC Comments", for comments regarding Soil Removal and Segregation.](#)

Corrective Action \_\_\_\_\_

Operator shall submit documentation attached to a Form 4 Sundry with information detailing  
1) The topsoil depth of the Location prior to soil salvage and segregation, 2) The amount of  
soil that was salvaged and stored.Date **06/17/2020**

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment \_\_\_\_\_

[See "Stormwater"](#)

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 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 \_\_\_\_\_

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 ☐

**COGCC Comments**

Comment	User	Date
<b>SOIL REMOVAL AND SEGREGATION</b>  "Const. Layout Drawings" doc. #402079388 attached to the Form 2A identifies three separate soil stockpile areas on the Location; An estimated "2,300 cy topsoil stockpile" stored on the north end, "1340 cy topsoil stockpile" stored to the west end, and "3,080 cy Excess Soil Stockpile" stored on the south end of the Location. The attached figure indicates an estimated 6,720 cubic yards of soil, with 3,640 cubic yards being topsoil, will be stockpiled on the Location.  It was observed in this inspection that only one soil stockpile appears to have been created (south end of the Location). The amount of salvaged material observed does not appear to reflect the amount of topsoil Operator indicated would be salvaged within doc. #402079388, and appears insufficient based on the size of the constructed pad, per Rule 1002.b.(2).	trujilloam	06/08/2020

**Attached Documents**

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

Document Num	Description	URL
696201370	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5171310">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5171310</a>