

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

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.

LocationOverall 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:

Corrective Action:

Date:

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	
	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:	
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	
	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:	
Comment:			
Corrective Action:			Date:
On Site Inspection (305):			
Surface Owner Contact Information:			
Name: _____		Address: _____	
Phone Number: _____		Cell Phone: _____	
Operator Rep. Contact Information:			

Inspector Name: Trujillo, Aaron

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:

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 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: 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
SOIL REMOVAL AND SEGREGATION "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
402418817	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5171327
696201370	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5171310