

**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:

05/14/2021

Submitted Date:

05/24/2021

Document Number:

696202700

FIELD INSPECTION FORM
 Loc ID 324411 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:

5 Number of Comments

2 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	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
324411	LOCATION	AC			-	CHEVRON TR 43-32-597	RI

General Comment:

On 5/14/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection TEP's Chevron TR 43-32-597 Location in Garfield County, Colorado.

This inspection is a followup to #696202378 to document compliance with the following corrective actions:
34-60-121(1) CRS-b: Signage missing per Form 4 COAs

The following compliance issues were observed during this inspection:
406.e: Conductors
1003: Interim Reclamation

Refer to the "Reclamation" and "Location" 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.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

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

Type OTHER

Comment: Pursuant to the NTO and Form 4 #402135329, Operator was required to post a sign at the location entrance stating the following: "A COGCC variance has been approved to delay the commencement of interim reclamation to no later than May 10th, 2021".

Inspection #696202378 observed that required signage per the NTO was missing; Signage was required by 07/12/2020.

Though the variance has expired and signage is no longer a condition, signage required per the NTO and conditions was NOT installed on the Location. Operator failed to comply with Form 4 Conditions and requirements of the NTO.

Corrective Action:

Date:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

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:

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

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: OTHER, 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? **Fail** _____Comment [See "COGCC Comments" for comments regarding stockpiled soils stored on Location.](#)

Corrective Action

If materials observed stored on the Location is sediment removed from traps, in which Operator intends to utilize during interim reclamation, then Operator is required to submit the Reclamation Plan attached to a Form 4 Sundry to Reclamation Specialist. Submittal of the information does not preclude enforcement action.

If not, material is required to be removed from the Location.

Date **05/27/2021**

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? Fail 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? Fail

Production areas have been stabilized? _____ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATIONCropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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

Operator previously received a 502.b "Delayed Interim Reclamation Variance" (#402135329) to delay interim reclamation of the Location to no later than May 10, 2021; variance has expired.

It was observed in this inspection that interim reclamation of the Location has not been conducted in accordance with 1003 Rules; Records show permits for undrilled wells have been deleted.

It was also observed that the conductors associated with the undrilled wells have not been plugged and reclaimed.

Corrective Action

Comply with Rule 406.e.(4) and plug and reclaim conductors. Comply with Rule 1003 and perform interim reclamation of the Location. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until Final Reclamation has passed. A CA date of 5/10/2021 is being provided as this was when interim reclamation was required by, per Sundry #402135329 conditions. Location will remain out of compliance until CA has been addressed in its entirety.

Date 05/10/2021Overall Interim Reclamation Fail**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: OTHER, 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 ☐**COGCC Comments**

Comment	User	Date
<p>SEDIMENT STORAGE</p> <p>It was observed in this inspection that soil stockpiles are being stored along the northwest end of the Location.</p> <p>A TEP Contractor was observed hauling material from sediment traps in the Crystal Creek area, and placing/storing on a nearby Location. After additional review and conversations with TEP, the material stored on the northwest end of the Location appears to also be sediment removed during trap maintenance; sediment is considered a pollutant, and the use of the Location to place and store the material does not comport with Rule 606 good housekeeping requirements, as well as 1003 Rules.</p> <p>Operator indicated on an email regarding Location #335915, that the sediment material might be utilized during interim reclamation of the Location to "supplement" the topsoil (See inspection #696202697); Operator is directed to not "supplement" the topsoil with sediment removed from traps, as this will degrade the topsoil if mixed, and is not suitable to be used as topsoil resource.</p> <p>If materials observed stored on the Location is sediment removed from traps, in which Operator intends to utilize during interim reclamation, then Operator is required to submit an Interim Reclamation Plan for approval, as directed by Reclamation Supervisor D. Arthur in the 5/21/2021 phone call with TEP:</p> <p>Operator is directed to submit a Reclamation plan that includes figures of the Location showing existing, post-interim and final reclamation contours; cut/fill balances; the current location where the sediment has been improperly stored on Location, and its final placement post interim reclamation. For placement of the sediment it must be made clear what depth it will be placed below the topsoil, and must only be used as subsoil material.</p> <p>Any future material from sediment trap maintenance for potential use in the reclamation for the current year will need to be approved by COGCC prior to it being placed on any locations and requires a Reclamation Plan.</p>	trujilloam	05/24/2021

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

Document Num	Description	URL
696202708	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439512