

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 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.

**Location**

Overall 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:

**Inspected Facilities**

Facility ID: 324411 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**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 SEGREGATION \_\_\_\_\_

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 REVEGETATION**

Cropland

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 05/10/2021

Overall 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><b>SEDIMENT STORAGE</b></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 Documents**

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

Document Num	Description	URL
402699195	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439534">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439534</a>
696202708	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439512">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439512</a>