

**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:

10/25/2021

Submitted Date:

10/27/2021

Document Number:

696203309**FIELD INSPECTION FORM**Loc ID 452011 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 96850Name of Operator: TEP ROCKY MOUNTAIN LLCAddress: PO BOX 370City: PARACHUTE State: CO Zip: 81635**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**14 Number of Comments6 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
Arauza, Steven		steven.arauza@state.co.us	
,		COGCCInspectionReports@terraep.com	All Inspections
Heil, John		john.heil@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
452011	LOCATION	AC			-	FEDERAL RU 31-17	RI

General Comment:

On 10/25/2021, Reclamation Specialist Trujillo conducted a reclamation and stormwater inspection at TEP Rocky Mountain's Federal RU 31-17 location in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

1002.f: Stormwater

606.c/1002.c/1003.a: Noxious weeds

905.a.(1): Management of E&P Waste

908: Pit permitting

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

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Drill Cuttings				
Comment	<p>Form 2A Conditions of Approval ("COA") states that "no 'ONSITE' disposal of cuttings will be allowed without prior approval of a Waste Management Plan (submitted via a Form 4 Sundry Notice) specifying 'ONSITE' disposal and where the cuttings will be placed on the location".</p> <p>No Waste Management Plan has been submitted via a Form 4.</p>			
Corrective Action	Operator is directed to submit documentation attached to a Form 4 to show compliance with Form 2A #401058467 COAs. Request that sundry is routed to West Environmental Supervisor Alex Fischer, and Northwest Reclamation Specialist Trujillo.			Date: 11/03/2021
Drill Cuttings		Inadequate		
Comment	<p>Stormwater has been allowed to flow into the cuttings trench on the south end of the Location; this does not comport with 1002.f.(2)A. Form 2A required that drill cuttings managed onsite shall be kept as low as practicable to prevent accumulation of liquids. Fluids within trench are preventing cuttings material from remaining dry, and is also considered E&P waste requiring removal.</p>			
Corrective Action	Remove and properly dispose of E&P waste to ensure any cuttings within trench remain dry.			Date: 11/11/2021

Spill/Remediation:

Comment:

Corrective Action: Date:

Emission Control Burner (ECB): Comment: Pilot: Wildlife Protection Devices (fired vessels):

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 SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

See Comment #1 under "COGCC Comments". See "interim reclamation" below regarding noxious weeds.

Corrective Action _____

Comply with Rule 1002.c; implement controls to prevent further mixing and contamination of topsoil.

Date 11/03/2021

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? _____ F _____

Comment **Completion operations were observed during inspection. Equipment on Youberg RU /44-7 used for Frac operations on the Federal RU 31-17 observed being demobilized. Interim reclamation due 6 months from completion on non crop-land.**

Noxious weeds including, but not limited to, Canada thistle, Plumeless thistle, Bull thistle, Houndsetongue, Common Mullein, observed established on the topsoil stockpiles and cutslopes of the Location.

Corrective Action **Comply with Rule 606.c, 1002.c and 1003.f. Due to the onset of winter conditions, additional weed management will need to be conducted in the 2022 growing season to prevent further spread and establishment.**

Date **11/11/2021**

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 ☐**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Waddles	Fail					Location perimeter
	Fail					Protection/stabilization @ cut/fill slopes
Sediment Traps	Fail					NW Location entrance
Sediment Traps	Fail					3, northern production area

Comment: [See Comment #2 under "COGCC Comments".](#)Corrective Action: **Comply with Rule 1002.f and install or repair stormwater and erosion control measures in accordance with good engineering practices. Ensure control measures are adequate for the site's conditions, and maintained in proper functioning condition.**

Date: 11/03/2021

Pits: ☐ NO SURFACE INDICATION OF PIT

Type: _____ Lined: _____ Pit ID: _____ Lat: _____ Long: _____

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

Lining:

Liner Type: _____ Liner Condition: _____

Comment: [Pursuant to Rule 909.a, Operators will ensure that pits are properly permitted through a Form 15, including cuttings trenches approved on a Form 2A. Cuttings trench open/active on the south end of the Location; trench requires permitting.](#)Corrective Action: **Submit an eForm 15 Pit Report to update COGCC records with current information. Upon submission of the Form 15, provide notice of submission via email to West Environmental Supervisor Alex Fischer (alex.fischer@state.co.us)**

Date: 11/11/2021

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective Action: _____

Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

Corrective Action: _____

Date: _____

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

Comment: _____

Corrective Action: _____

Date: _____

COGCC Comments

Comment	User	Date
<p>COMMENT #1</p> <p>BMPs to protect stockpiled soils from degradation due to contamination, wind and water erosion, and to prevent weed establishment are missing or insufficient.</p> <p>It was observed in this inspection that topsoil has been stockpiled along the perimeter of the Location (as indicated in the construction layout doc. #401332488). A single row of straw wattle erosion logs has been placed between the toe of the fill slopes and the topsoil stockpiles; wattle observed to be inadequate to manage runoff from the location, and to mitigate sediment discharge onto the topsoil stockpiles</p> <p>Noxious weeds including, but not limited to, Canada thistle, Plumeless thistle, Bull thistle, Houndsetongue, Common Mullein, observed established on the topsoil stockpiles throughout the Location.</p>	trujilloam	10/27/2021
<p>COMMENT #2</p> <p>It was observed in this inspection that stormwater and erosion control measures on the Location are missing or insufficient:</p> <ul style="list-style-type: none"> - A single row of straw wattle observed installed along the perimeter of the Location; wattle alone inadequate to properly manage runoff from the entire Location, and to allow for sediment laden-free stormwater discharge; BMP observed to not be in proper functioning condition along several sections of the wattle, resulting in offsite sediment discharge, as well as contamination and erosion degradation at the topsoil stockpiles. -Control measures to protect and stabilize the cut/ fill slopes of the Location and access road are missing or insufficient; erosion degradation evident. -Sediment traps at the Location entrance, and on the southeastern perimeter have not been installed with appropriate inlet and outlet protection in accordance with good engineering practices; geotextile lining not observed; erosion degradation under/around rip-rap material evident; offsite erosion degradation and sediment transport observed below outlets of both traps. - Operator appears to be utilizing the topsoil stockpiles along the perimeter of the Location as a stormwater control berm; use of topsoil as a stormwater control measure does not comport with Rule 1002.b and 1002.c. - Operator has constructed 3 sediment traps with slope drains along the northern and eastern perimeter of the working pad area. Operator has also installed a berm at the inlet of the traps rendering them inoperable. Control measures to allow for proper stormwater discharge from the production area is inadequate. -Culvert at the Location entrance has filled with sediment. 	trujilloam	10/27/2021

Attached Documents

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

Document Num	Description	URL
696203310	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5565757