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

FIELD INSPECTION FORM

Inspection Date: 11/05/2021
Submitted Date: 11/09/2021
Document Number: 696203364

Loc ID	Inspector Name:	On-Site Inspection	
480732	Trujillo, Aaron	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:

- [x] THIS IS A FOLLOW UP INSPECTION
- [x] FOLLOW UP INSPECTION REQUIRED
- [ ] NO FOLLOW UP INSPECTION REQUIRED

Findings:

17 Number of Comments
5 Number of Corrective Actions
- [x] 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
,		dnr_cogccenforcement@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
, "		COGCCInspectionReports@terraep.com	All Inspections
Arauza, Steven		steven.arauza@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
480732	LOCATION	AC			-	FEDERAL WMC 24-17	CI

General Comment:

Inspector Name: Trujillo, Aaron

On 11/05/2021, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction inspection at TEP Rocky Mountain's Federal WMC 24-17 location in Garfield County, Colorado.

This inspection is a followup to:

#696203195 dated 10/8/2021;
and #696203305 dated 1025/2021 to document compliance with the following corrective actions:
1002.f: Stormwater
908.c.(2): Cuttings trench permitting

It was observed that the Location remains out of compliance with COGCC Rules and corrective actions.

New additional compliance issues observed in this inspection:
606/906: Good Housekeeping, management of non-E&P waste

Refer to the "Construction", "Location", "pit" and "Comments" 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

Inspector Name: Trujillo, Aaron

Location

Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action: Date:

Good Housekeeping:			
Type	DEBRIS		
Comment:	Concrete/cement waste/debris observed within the cuttings trench; Operator appears to have “washed out” into the trench post conductor installs and cementing operations. Concrete/cement waste/debris requires removal and proper disposal in accordance with Rule 606, and Rule 906.a-d		
Corrective Action:	Comply with Rule 606, and Rule 906.a-d.	Date:	11/16/2021

Overall Good: ☐

Spills:					
Type	Area	Volume			

In Containment: No

Comment:

☐ Multilple Spills and Releases?

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Location Construction

Location ID: 480732 CDP:

Comment: Form 2A permitted disturbance area during construction is 4.89 acres (reduced to 1.08 after interim). With use of a sUAS, Reclamation Specialist mapped the disturbance area of the Location to be 5.1 acres. Location exceeds permitted disturbance area by ~0.2 acres

Corrective Action: **Date:**

Form 2A COAs:

Comment:

Corrective Action: **Date:**

Wildlife BMPs:

Comment:

Corrective Action: **Date:**

Stormwater:

Erosion BMPs	Present	Other BMPs	Present

			`

Comments: Erosion BMPs: Operator's stormwater management plan states a rock wall will be constructed on the northeast corner of the pad location to preserve vegetation near this corner; rock wall structure not observed per the plan.

Other BMPs:

Corrective Action: Date:

RETENTION PONDS			`

Comments: Erosion BMPs: See "Comment #1" for comments regarding the sediment traps on the north end of the Location.

Original CA and date remains applicable. Additionally, it is noted that the controls have not been constructed in accordance with good engineering practices.

Other BMPs:

Corrective Action: Submit the detailed, stamped engineering plan showing installation specifications (trap dimensions, construction materials used, grade, etc..) showing that the sediment trap control measures have been constructed in accordance with good engineering practices, and are appropriate in size to manage runoff from the Location's disturbance, and the upslope undisturbed drainage area. Date: 10/19/2021

BERMS	No		`

Comments: Erosion BMPs: Operators Stormwater Management plant states a "drive over berm" will be constructed at the Location entrance; control measure was not constructed per the plan.

Other BMPs:

Corrective Action: Date:

DITCHES			`

Comments: Erosion BMPs: See "Comment #2" regarding the stormwater diversion ditch along the perimeter, and the velocity checks.

Other BMPs:

Corrective Action: Comply with Rule 1002.f Date: 10/19/2021

			`

Comments: Erosion BMPs: Sediment trap has been constructed at the ditch on the southwest end of the Location; BMP has been constucted with a geotextile lining beneath riprap material at the outlet; stormwater discharged from the trap will travel through a culvert beneath the access road, then north to one of the two sediment traps on the northwest end of the Location.

Other BMPs:

Corrective Action: Date:

			`

Comments: Erosion BMPs: See "Comment #3" regarding slope drains on the northern perimeter of the working pad area.

Other BMPs:

Corrective Action: Comply with Rule 1002.f Date: 11/16/2021

Comment: Based on observations during this inspection, and within inspection Nos. #696203195 and #696203305, Operator has not followed their Stormwater Management Plan.

Date:

Corrective Action:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

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:

Inspected Facilities

Facility ID:	480732	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI

Reclamation - Storm Water - Pit

Interim Reclamation:

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

Land Use: RANGELAND, RECREATIONAL

Comment:

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment

Corrective Action Date

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment: Inspection #696203195 documented intact rooted vegetation and topsoil beneath fill material on the location. The topsoil plan #402763914 states ~4,700 cy of topsoil will be salvaged/stockpiled.

With use of a sUAS, it is observed that the ~2,200 cy of topsoil is stored on the east end of the Location; Operator failed to salvage, segregate and store all topsoil within the Location's disturbance area during construction.

Corrective Action Date

1002c. PROTECTION OF SOILS _____

Comment

Corrective Action Date

1002E. SURFACE DISTRURBANCE 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

Inspector Name: Trujillo, Aaron

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: Well conductors have been installed; plate observed on top of conductor pipes.

Pursuant to Rule 406.e.(4), if wells have not been drilled within 6 months on rangeland, then Operator will plug the conductor and perform to either Rule 1003 or Rule 1004. F42s for cement casing for conductors date 10/2021; wells required drilling or reclamation by 4/2022.

If drilling operations commence, but are not continuous, Operator is required to comply with the Interim Relcmation Procedures for Delayed Operations NTO.

Corrective Action _____ Date _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

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

Final Land Use: 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 _____

Inspector Name: Trujillo, Aaron

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

Comment:

Corrective Action: Date:

Pits: NO SURFACE INDICATION OF PIT

Type: Lined: NO Pit ID: Lat: Long:

Reference Point: Other: Length: Width:

Lining:

Liner Type: Liner Condition:

Comment:

Corrective Action Date:

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: Previous inspections observed that the cuttings trench/pit has been constructed on the southeast end of the Location. Pursuant to 908.c.(2), Operators are required to submit a Form 15, Earthen Pit Report/Permit within 30 days after constructing a cuttings trench approved on a Form 2A. Inspections noted that a Form 15 has not been submitted to permit the pit, and required Operator to provide the date the cuttings trench was constructed within a FIRR by 10/29/2021.

To date, Operator has neither submitted a date trench was constructed within a FIRR, or a Form 15 to permit the pit/trench in accordance with 908.c.(2).

Corrective Action: Due to non-compliance, the original CA is being update:

Provide the date cuttings trench was constructed within a FIRR. Comply with Rule 908.c.(2)

Date: 10/29/2021

COGCC Comments

Comment	User	Date
COMMENT #1 Per TEP's Stormwater Management Plant #402770838, Operator indicated three (3) sediment traps were planned along the northern perimter of the Location (1 on the northwest end of the Location, 1 north/central, and 1 at the northeast end of the Location). Operator has only constructed two (2) sediment traps on the northern perimeter of the Location; both traps were constructed adjacent to one another at the northwest corner. Inspection #696203195 and #696203305 observed that the two sediment traps constructed on the northwest corner did not appear appropriate in size to manage runoff from the drainage area of the Location and upslope, undisturbed areas, or installed per good engineering requirements. Inspections required Operator to submit detailed, stamped engineering plans showing that the control measures have been constructed in accordance with good engineering practices, and are appropriate in size to manage runoff. It was observed in this inspection that the sediment traps remain unchanged; sediment trap outlets have not been installed with a geotextile lining per good engineering practices. Operator failed to submit the required supporting information per the corrective action.	trujilloam	11/09/2021
COMMENT #2 Inspection #696203195 and #696203305 observed that the stormwater diversion ditch along the perimeter of the Location has not been constructed in accordance with good engineering practices; BMPs improperly constructed with vertical slopes, soils within the control measure are unconsolidated and is a pollutant source. Inspections also observed that many velocity checks (rock checks) within the ditch have not been constructed in accordance with good engineering practices; rock material utilized in several checks observed to be inappropriate in size. It was observed in this inspection that the diversion ditches along the perimeter of the Location remain improperly constructed per good engineering practices and will facilitate erosion degradation as well as increase sediment loads within the ditch. Velocity checks within the ditch remain improperly constructed per good engineering practices, with inappropriate sized material; large voids can be observed within a majority of the checks and will not interrupt stormwater velocity; stormwater runoff will accelerate around the rock material, resulting in erosion within the ditch and increased sediment loads.	trujilloam	11/09/2021
COMMENT #3 It was observed that Operator has installed 4-5 slope drains on the northern perimeter of the working pad area. Slope drains have not been installed in accordance with good engineering practices; drains constructed with flexible pipe; pipe has not been properly anchored/secured to the ground. Slope drains discharge into the perimeter stormwater diversion ditch along the northern perimeter of the Location; slope drains have not been constructed with stabilized/armored outlets; outlet of slope drain on the northwest corner discharges onto the fill slope above the sediment trap- erosion degradation evident at outlet.	trujilloam	11/09/2021

Attached Documents

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

Document Num	Description	URL
696203366	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5575998