

**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:

11/19/2021

Submitted Date:

11/19/2021

Document Number:

696203369

FIELD INSPECTION FORMLoc ID 480732 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:

3 Number of Comments

1 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
Heil, John		john.heil@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	
Arthur, Denise		denise.arthur@state.co.us	
Fischer, Alex		alex.fischer@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:

This is a desktop inspection in response to Resolution Doc. #402872406 solely to address the cement wastes within the cuttings trench.

This inspection is to update corrective actions from inspection 696203364 requiring the removal of the cement waste.

Refer to the "COGCC Comments", and the "Good Housekeeping" sections of this report for additional details.

Any outstanding corrective actions from previous inspections that have not been addressed remain applicable.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type

OTHER

Comment: See "Comment #1" under "COGCC Comments" at the end of this report.

Corrective Action: Corrective action from FIR #696203364 requiring the removal and proper disposal of the cement returns within the Cuttings Trench remains applicable.

Date: 11/16/2021

In addition to the removal requirements, COGCC is also requiring Operator to submit documentation of removal; including date stamped photo documentation showing cement waste has been removed from the cuttings trench, and the waste manifests to document proper disposal of the E&P wastes at an approved Facility.

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 FacilitiesFacility ID: 480732 Type: LOCATION API Number: - Status: AC Insp. Status: CI**COGCC Comments**

Comment	User	Date
<p>COMMENT #1</p> <p>Inspection #696203364 observed concrete/cement waste/debris within the cuttings trench. Inspection required Operator to remove and properly dispose of the waste/debris in accordance with Rule 906.a-d.</p> <p>Operator submitted Resolution no. 402872406 stating that the waste observed was concrete returns, and therefore E&P waste.</p> <p>After review with COGCC Environmental group, it was been determined that the corrective action will remain applicable, and the resolution was "not approved" with the following comment:</p> <p>As stated by the Operator certifying that the statements made in this form (Resolution #402872406) are true and correct, COGCC Reclamation and Environmental Supervisors concur that the concrete returns are considered E&P waste.</p> <p>Concrete drill out cores and solidified cement returns cannot be homogeneously blended as per the Federal WMC 24-17 Pad "Waste Management Plan" (doc. no. 402700645), and therefore would not meet the Table 915-1 standards, and shall be properly disposed of at an appropriate facility. Additionally, concrete cement returns (E&P waste) are not allowed to be disposed of in a Cuttings Trench. A Cuttings Trench is used specifically for the onsite storage and disposal of dried cuttings generated from drilling a Well. Therefore, no other E&P waste shall be placed in the Cuttings Trench.</p>	trujilloam	11/19/2021