

**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:

05/05/2022

Submitted Date:

05/25/2022

Document Number:

696203718

FIELD INSPECTION FORM

Loc ID 480732	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	Status Summary: <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED Findings: 17 Number of Comments 8 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
Operator Information: OGCC Operator Number: 96850 Name of Operator: TEP ROCKY MOUNTAIN LLC Address: 1058 COUNTY ROAD 215 City: PARACHUTE State: CO Zip: 81635				ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE

Contact Information:			
Contact Name	Phone	Email	Comment
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		john.heil@state.co.us	

Inspected Facilities:							
Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
480785	WELL	AP	09/21/2021		045-24484	FEDERAL WMC 311-20	RI
480786	WELL	AP	09/21/2021		045-24485	FEDERAL WMC 511-20	RI
480787	WELL	AP	09/21/2021		045-24486	FEDERAL WMC 312-20	RI
480788	WELL	AP	09/21/2021		045-24487	FEDERAL WMC 512-20	RI
480789	WELL	AP	09/21/2021		045-24488	FEDERAL WMC 33-20	RI
480790	WELL	AP	09/21/2021		045-24489	FEDERAL WMC 532-20	RI
480791	WELL	AP	09/21/2021		045-24490	FEDERAL WMC 432-20	RI
480792	WELL	AP	09/21/2021		045-24491	FEDERAL WMC 332-20	RI
480793	WELL	AP	09/21/2021		045-24492	FEDERAL WMC 11-20	RI
480794	WELL	AP	09/21/2021		045-24493	FEDERAL WMC 411-20	RI
480795	WELL	AP	09/21/2021		045-24494	FEDERAL WMC 12-20	RI
480796	WELL	AP	09/21/2021		045-24495	FEDERAL WMC 412-20	RI
480797	WELL	AP	09/21/2021		045-24496	FEDERAL WMC 13-20	RI
480798	WELL	AP	09/21/2021		045-24497	FEDERAL WMC 32-20	RI
480799	WELL	AP	09/21/2021		045-24498	FEDERAL WMC 531-20	RI
480800	WELL	AP	09/21/2021		045-24499	FEDERAL WMC 431-20	RI
480801	WELL	AP	09/21/2021		045-24500	FEDERAL WMC 331-20	RI

General Comment:

On 5/6/2022, 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;
#696203305 dated 10/25/2021;
#696203364 dated 11/5/2021;
#696203369 dated 11/19/2021;
and #696203408 dated 12/7/2021 to document compliance with the following corrective actions:

- Stormwater
- Disposal of cement (E&P) waste

It was observed in this inspection that the Location is out of compliance with COGCC Rules and Corrective actions.

The following NEW compliance issues were observed during this inspection:

- Stormwater/Slope Stabilization
- Signage
- Soil Salvage

Refer to the "Location", and "Reclamation" 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:	Signage missing at Location entrance		
Corrective Action:	Install sign to comply with 605.a	Date:	06/25/2022

Emergency Contact Number:

Comment:		Date:	
Corrective Action:			

Good Housekeeping:

Type	OTHER		
Comment:	See "Comment #1" under "COGCC Comments"		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location ConstructionLocation ID: 480732 CDP: Comment: Corrective Action: Date: **Form 2A COAs:**Comment: Corrective Action: Date: **Wildlife BMPs:**Comment: Corrective Action: Date: **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
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RETENTION PONDS	Yes		
Comments: Erosion BMPs: It was observed in this inspection that the outlets at the 4 sediment traps have not been appropriately engineered, and are inadequate to allow for proper stormwater discharge. Stormwater is discharging from the traps at sections where the outlet was not constructed, or is discharging around and degrading the outlet; degradation and offsite sediment transport evident Other BMPs:			
Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.			Date: 06/01/2022
	No		
Comments: Erosion BMPs: It was observed in this inspection that stormwater erosion controls measures to protect/stabilize, and minimize erosion and degradation are missing or insufficient on the slopes of the access road; erosion degradation evident; large section of slopes has sloughed onto the access road. Other BMPs:			
Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.			Date: 06/01/2022
DITCHES			
Comments: Erosion BMPs: See "Comment #3" under "COGCC Comments" regarding the stormwater diversion ditch along the perimeter, and velocity checks Other BMPs:			
Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.			Date: 10/19/2022
RETENTION PONDS			
Comments: Erosion BMPs: See "Comment #2" under "COGCC Comments" Other BMPs:			
Corrective Action:			Date:
	No		
Comments: Erosion BMPs: It was observed in this inspection that stormwater erosion control measures to protect/stabilize and minimize erosion and degradation are missing or insufficient on the slopes of the Access road; large section of slope observed to have sloughed off and is partially covering the access road. Other BMPs:			
Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.			Date: 06/01/2022
	No		
Comments: Erosion BMPs: It was observed in this inspection that stormwater erosion controls measures to protect/stabilize, and minimize erosion and degradation are missing or insufficient on the fill slopes of the Location; large cracking becoming apparent at top of the fill slopes; slopes appear to be sloughing. Hydromulch previously observed on the fill slopes has not been maintained resulting in erosion, degradation and offsite sediment transport. Other BMPs:			
Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.			Date: 06/01/2022

DITCHES

Yes

Comments: Erosion BMPs:

It was observed in this inspection that there are apparent low points within the ditch along the north end of the Location where stormwater is discharging from, rather than flowing into the northwestern sediment traps.

Additional BMPs required to allow for sediment laden-free discharge at these points, or the diversion ditch requires re-engineering/maintenance to allow runoff to properly flow into the sediment traps.

Other BMPs:

Corrective Action: Comply with 1002.f and install or maintain stormwater and erosion control BMPs in accordance with good engineering practices.

Date: 06/01/2022
2

Comment:

Corrective
Action:

Date:**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: <u>480785</u>	Type: <u>WELL</u>	API Number: <u>045-24484</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480786</u>	Type: <u>WELL</u>	API Number: <u>045-24485</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480787</u>	Type: <u>WELL</u>	API Number: <u>045-24486</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480788</u>	Type: <u>WELL</u>	API Number: <u>045-24487</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480789</u>	Type: <u>WELL</u>	API Number: <u>045-24488</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480790</u>	Type: <u>WELL</u>	API Number: <u>045-24489</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480791</u>	Type: <u>WELL</u>	API Number: <u>045-24490</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480792</u>	Type: <u>WELL</u>	API Number: <u>045-24491</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480793</u>	Type: <u>WELL</u>	API Number: <u>045-24492</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480794</u>	Type: <u>WELL</u>	API Number: <u>045-24493</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480795</u>	Type: <u>WELL</u>	API Number: <u>045-24494</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480796</u>	Type: <u>WELL</u>	API Number: <u>045-24495</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480797</u>	Type: <u>WELL</u>	API Number: <u>045-24496</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480798</u>	Type: <u>WELL</u>	API Number: <u>045-24497</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480799</u>	Type: <u>WELL</u>	API Number: <u>045-24498</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480800</u>	Type: <u>WELL</u>	API Number: <u>045-24499</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480801</u>	Type: <u>WELL</u>	API Number: <u>045-24500</u>	Status: <u>AP</u>	Insp. Status: <u>RI</u>

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 _____ Fail _____

Comment _____

See "Comment #4" under "COGCC Comments" regarding soil salvage and segregation.

Corrective Action _____

Improper soil salvage has resulted in the loss or degradation of the topsoil resource, therefore Operator is being directed to propose an acceptable solution to the COGCC, in order to resolve the soil salvage compliance issues.

Date **06/03/2022**

Operator shall provide solution and justifications attached to a Form 4, and submit with a request that document is routed to NW Reclamation Specialist Trujillo.

This corrective action will stand until issue has been resolved.

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

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? _____

Comment Location/Pad has been constructed and well conductors set; continuous drilling Operations is not ongoing. Location appears to be out of compliance with with the Notice to Operators: Interim Reclamation Procedures for Delayed Operations (dated 1/5/2017). This issue is currently being reviewed internally.

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 _____

Comment: _____

Corrective Action: _____ Date _____

Overall Final Reclamation _____	Well Release on Active Location <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>
COGCC Comments		
Comment	User	Date
<p>COMMENT #1</p> <p>On 11/05/2021 inspection observation included: "Concrete/cement waste/debris observed within the cuttings trench; Operator appears to have washed out into the trench post conductor installs and cementing operations. A corrective action (CA) was written: "Concrete/cement waste/debris requires removal and proper disposal in accordance with Rule 606, and Rule 906.a-d with a CA date of 11/16/2021." (See Inspection Doc #696203364). It should be noted that the operator did not comply with the CA. However, on 01/11/2022 the Operator submitted a Form 4 (Doc #402922519) to amend their Waste Management Plan per Rule 905.a.(4).C. to accept cement returns, frac sands, and contaminated soil that was approved by the Oil and Gas Location Assessment (OGLA) Staff on 01/18/2022.</p> <p>The CA for properly disposing of "Concrete/cement waste/debris" per Inspection Doc #696203364 has been addressed. All future requests for changes to Waste Management Plans shall be reviewed by the Area Environmental Protection Staff (EPS). Please include in the "Comments Section" of the Form 4, when handling environmental issues, this wording; "Please to route this form 4 to the Area EPS Staff".</p>	trujilloam	05/23/2022
<p>COMMENT #2</p> <p>Previous inspections observed that sediment traps on Location did not appear appropriate in size to manage runoff from the drainage area of the Location and upslope, undisturbed areas. Inspection required Operator to 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.</p> <p>Operator submitted doc. #403021106 (attached to FIRR #403021078) with a stamp engineered plan detailing the size of the 4 traps.</p> <p>Though many of the details per the corrective action were not provided, based on the information included the traps appear adequate in size. This corrective action has been addressed, though it is noted that corrective action was not addressed until 182 days after the corrective action due date.</p>	trujilloam	05/23/2022
<p>COMMENT #3</p> <p>Previous inspections 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.</p> <p>It was observed in this inspection that the diversion ditches along the perimeter of the Location remain improperly constructed and consolidated per good engineering practices, and have facilitated erosion.</p> <p>Several velocity checks observed 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; it was observed that stormwater runoff has accelerated and/or become concentrated around the rock material, resulting in erosion within the ditch.</p>	trujilloam	05/23/2022

COMMENT #4

trujilloam

05/23/2022

Previous inspections noted that soil removal and segregation of ALL topsoil within the disturbance area does not appear to have been conducted. The Operator's Topsoil Plan provides different information regarding how much topsoil would be salvaged and stored on the east end of the; some sections identify 4,700 cubic yards, others state 3,890 cy.

Pursuant to Rule 1002.b.(2), Operator is required to salvage all topsoil, or the top 6 inches (whichever is deeper); multiple test pits conducted in the adjacent references show topsoil could have exceeded 22 inches in depth on the Location.

With use of a sUAS, it is observed that only ~2,300 cy of topsoil has been salvaged and stored on the east end of the Location; disturbance area of the Location is ~5.13 acres; at a minimum Staff would expect to see ~4,186 cy of topsoil stored.

Operator failed to conduct proper topsoil salvage operations on the Location.

Attached Documents

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

Document Num	Description	URL
403059963	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5763554
696203719	Inspection Photos and Issue report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5763544