

**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:

11/21/2022

Submitted Date:

11/29/2022

Document Number:

696204375**FIELD INSPECTION FORM**

Loc ID 482958	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <input type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED
<b>Operator Information:</b> OGCC Operator Number: <u>96850</u> Name of Operator: <u>TEP ROCKY MOUNTAIN LLC</u> Address: <u>1058 COUNTY ROAD 215</u> City: <u>PARACHUTE</u> State: <u>CO</u> Zip: <u>81635</u>				<b>Findings:</b> 16 Number of Comments 3 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested <b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

**Contact Information:**

Contact Name	Phone	Email	Comment
Dupire, Matt		mdupire@blm.gov	BLM Meeker
Heil, John		john.heil@state.co.us	
		john.noto@state.co.us	
Kubeczko, Dave		dave.kubeczko@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
482958	LOCATION	AC			-	FEDERAL RG 11-13-298	CI
483227	WELL	AP	11/09/2022		103-12581	FEDERAL RG 523-13-298	CI
483228	WELL	AP	11/09/2022		103-12582	FEDERAL RG 321-13-298	CI
483229	WELL	AP	11/09/2022		103-12583	FEDERAL RG 522-13-298	CI
483230	WELL	AP	11/09/2022		103-12584	FEDERAL RG 423-13-298	CI
483231	WELL	AP	11/09/2022		103-12585	FEDERAL RG 324-12-298	CI
483232	WELL	AP	11/09/2022		103-12586	FEDERAL RG 524-12-298	CI
483233	WELL	AP	11/09/2022		103-12587	FEDERAL RG 424-12-298	CI
483234	WELL	AP	11/09/2022		103-12588	FEDERAL RG 24-12-298	CI
483235	WELL	AP	11/09/2022		103-12589	FEDERAL RG 331-14-298	CI
483236	WELL	AP	11/09/2022		103-12590	FEDERAL RG 423-12-298	CI
483237	WELL	AP	11/09/2022		103-12591	FEDERAL RG 21-13-298	CI
483238	WELL	AP	11/09/2022		103-12592	FEDERAL RG 323-13-298	CI
483239	WELL	AP	11/09/2022		103-12593	FEDERAL RG 34-11-298	CI
483240	WELL	AP	11/09/2022		103-12594	FEDERAL RG 421-13-298	CI
483241	WELL	AP	11/09/2022		103-12595	FEDERAL RG 23-13-298	CI
483242	WELL	AP	11/09/2022		103-12596	FEDERAL RG 521-13-298	CI

483243	WELL	AP	11/09/2022		103-12597	FEDERAL RG 22-13-298	CI
483244	WELL	AP	11/09/2022		103-12598	FEDERAL RG 434-11-298	CI
483245	WELL	AP	11/09/2022		103-12599	FEDERAL RG 523-12-298	CI
483246	WELL	AP	11/09/2022		103-12600	FEDERAL RG 334-11-298	CI
483247	WELL	AP	11/09/2022		103-12601	FEDERAL RG 422-13-298	CI
483248	WELL	AP	11/09/2022		103-12602	FEDERAL RG 322-13-298	CI

**General Comment:**

On 11/21/2022, Reclamation Specialist Trujillo conducted a construction and stormwater inspection at TEP's Federal/RG 11-13-298 Location in Rio Blanco County, Colorado.

The following compliance issues were observed during this inspection;

- Exceedence of the Permitted disturbance area
- Stormwater
- Protection of topsoil
- Stockpile Signage/Permit conditions

Refer to the "Location Construction", "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.

**Location**Overall Good: ☐**Signs/Marker:**

Type OTHER

Comment: Location signage and permit information located posted at the access road; location has since been constructed since the 9/29/2022 inspection; signage and permit information needs to be re-located to the Location entrance.

Corrective Action:

Date:

Type OTHER

Comment: Form 2A COA required signage at the topsoil stockpile; signage not observed per permit conditions.

Corrective Action: Install singage at topsoil stockpile.

Date: 12/28/2022

**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:

**Location Construction**

Location ID: 482958

CDP: \_\_\_\_\_

Comment: Pursuant to Form 2A #402932455, the permitted size of disturbance for the Location during construction is 8.15 acres. With the use of a sUAS, it was observed that the disturbance area of the Location is 8.46 acres; this exceeds the Oil and Gas Location Assessment's permitted disturbance area. OGLA included for notification purposes.

Corrective Action:

Date: \_\_\_\_\_

**Form 2A COAs:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Wildlife BMPs:**

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
	No		

Comments: Erosion BMPs: **See "Stormwater Comment #1" at the end of this report.**

Other BMPs:

Corrective Action: **Install engineered outlets to allow for proper stormwater discharge from the Pad Location, in accordance with Stormwater Management Plan #403047575** Date: 12/13/2022

WADDLES	Yes		
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Comments: Erosion BMPs: **Straw erosion logs implemented along the perimeter of the Location. BMP used in conjunction with sediment traps and strowmater diversion ditch along the western perimeter of the Location. BMP appears to be in proper functioning condition at time of inspection.**

Other BMPs:

Corrective Action: Date:

DITCHES	Yes		
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Comments: Erosion BMPs: **Stormwater diversion ditch implemented along the southwestern/western/northwestern perimeter of the Location. BMP used in conjunction with sediment traps and erosion logs. BMP appears to be per good engineering requirements, and in proper functioning condition at time of inspection.**

Other BMPs:

Corrective Action: Date:

RETENTION PONDS	Yes		
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Comments: Erosion BMPs: **Three sediment traps have been constructed on the eastern, southwestern and northwestern ends of the Location. BMPs appear to have been constructed with properly engineered inlets/outlet. BMPs appear to be in proper functioning condition at time of inspection.**

Other BMPs:

Corrective Action: Date:

	No		
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Comments: Erosion BMPs: **Stormwater Management Plan ("SWMP") #403047575 attached to the Form 2A permit states that cut and fill slopes will be hydro-mulched following completion of construction; pad construction largely completed- "Cuttings Trench" and "Trench Backfill" construction in process at time of inspection.**

Other BMPs: **BMPs required to stabilize, as well as to minimize erosion and degradation, at the cut and fill slopes of the Location upon completion of construction.**

Corrective Action: Date:

**Comment:**

**Corrective Action:** **Date:**

**On Site Inspection (305):****Surface Owner Contact Information:**

Name: Address: Phone Number: Cell Phone:

Inspector Name: Trujillo, Aaron

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>482958</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483227</u>	Type: <u>WELL</u>	API Number: <u>103-12581</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483228</u>	Type: <u>WELL</u>	API Number: <u>103-12582</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483229</u>	Type: <u>WELL</u>	API Number: <u>103-12583</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483230</u>	Type: <u>WELL</u>	API Number: <u>103-12584</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483231</u>	Type: <u>WELL</u>	API Number: <u>103-12585</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483232</u>	Type: <u>WELL</u>	API Number: <u>103-12586</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483233</u>	Type: <u>WELL</u>	API Number: <u>103-12587</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483234</u>	Type: <u>WELL</u>	API Number: <u>103-12588</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483235</u>	Type: <u>WELL</u>	API Number: <u>103-12589</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483236</u>	Type: <u>WELL</u>	API Number: <u>103-12590</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483237</u>	Type: <u>WELL</u>	API Number: <u>103-12591</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483238</u>	Type: <u>WELL</u>	API Number: <u>103-12592</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483239</u>	Type: <u>WELL</u>	API Number: <u>103-12593</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483240</u>	Type: <u>WELL</u>	API Number: <u>103-12594</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483241</u>	Type: <u>WELL</u>	API Number: <u>103-12595</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483242</u>	Type: <u>WELL</u>	API Number: <u>103-12596</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483243</u>	Type: <u>WELL</u>	API Number: <u>103-12597</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>
Facility ID: <u>483244</u>	Type: <u>WELL</u>	API Number: <u>103-12598</u>	Status: <u>AP</u>	Insp. Status: <u>CI</u>

Inspector Name: Trujillo, Aaron

Facility ID:	483245	Type:	WELL	API Number:	103-12599	Status:	AP	Insp. Status:	CI
Facility ID:	483246	Type:	WELL	API Number:	103-12600	Status:	AP	Insp. Status:	CI
Facility ID:	483247	Type:	WELL	API Number:	103-12601	Status:	AP	Insp. Status:	CI
Facility ID:	483248	Type:	WELL	API Number:	103-12602	Status:	AP	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 \_\_\_\_\_

Comment \_\_\_\_\_

Excluding areas of the topsoil stockpile, 7.87 acres have been disturbed. It was observed in this inspection that 10,306.22 cubic yards of topsoil has been stored on the south end of the Location. This equates to ~8,245 cubic yards of topsoil being salvaged over the disturbance area (pre-20% swell factor), at an average depth of 7.8 inches. Per the Topsoil Protection Plan #403047572, topsoil depth on the Pad Location ranged from 5" (adjusted to 6" per minimum requirements) to 10", resulting in an average depth of 7.5 inches. Based on this information, Operator appears to have met COGCC 1002.b.(2) soil salvage requirements.

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail

Comment \_\_\_\_\_

It was observed in this inspection that BMPs to protect and stabilize the topsoil stockpiles on the south end of the Location are missing or insufficient; soils exposed and at risk to wind and water erosion. Additionally, stockpiles have been constructed larger than generally recommended, resulting in steep and unstabilized slopes. A CA date of "date of inspection" is being provided, as topsoil salvage operations have completed on the Location, and BMPs should have been implemented at that time.

Corrective Action \_\_\_\_\_

Comply with Rule 1002.c, 1002.f and Form 2A Permit conditions; implement BMPs to stabilize the topsoil stockpiles, as well as to protect from wind and water erosion.

Date **11/21/2022**

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 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 \_\_\_\_\_

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 ☐ Multi-Well Location ☐

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Pad construction in process at time of inspection. Operator has constructed location with steep slopes. This is not advised as grade will create slope stabilization challenges. Cut/fill slopes are a mix of large rocky material, and finer soils.

Upon completion of pad construction, BMPs to stabilize, minimize erosion and degradation will be required at the cut and fill; SWMP #403047575 states that "cut and Fill slopes will be hydro-mulched following site construction"; hydro-mulching alone may be inadequate to stabilize slopes.

See "STORMWATER COMMENT #2" at the end of this report for additional comments.

Corrective Action:  Date:

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Type:	Lined:	Pit ID:	Lat:	Long:
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Reference Point:  Other:  Length:  Width:

**Lining:**

Liner Type:  Liner Condition:

Comment: Form 2A Location drawings identifies a Cuttings Trench on the northern areas of the Location; Cuttings trench construction observed "in process" at time of inspection.

A Form 15 is required to be submitted within 30 days of constructing the cuttings trench.

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:

Corrective Action:  Date:

**COGCC Comments**

Comment	User	Date
<p><b>STORWMATER COMMENT #1</b></p> <p>Stormwater Management Plan ("SWMP") #403047575 identifies three (3) outlet points to allow for stormwater to discharge from the working pad area of the Location, to the stormwater diversion ditch or a sediment trap along the perimeter.</p> <p>It was observed in this inspection that only one engineered outlet has been constructed, allowing for discharge into a sediment trap on the east end of the Location. No engineered outlets have been constructed on the northern/northwestern, or southern/southwestern end of the Location in order to allow for discharge per the SWMP; construction activities within areas the outlets were to be located appears to be completed.</p>	trujilloam	11/28/2022
<p><b>STORWMATER COMMENT #2</b></p> <p>Per figures included with the Form 2A permit, a "Trench Backfill" stockpile will be located on the north end of the Location. SWMP #403047575 states that stockpile will be hydro-mulched following completion of construction; trench and stockpile construction in process at time of inspection. Erosion logs currently only perimeter control at base of the slopes; stormwater diversion ditch only constructed along the southwestern, western and northwestern perimeter of the Location.</p> <p>Due to the site's conditions observed at the stockpile (size/grade of the slopes, the size of the fill material- large rocky material mixed with finer soils), hydro-mulching in conjunction with erosion logs may be inadequate to stabilize the slopes, to adequately manage runoff and to minimize erosion, degradation and sediment transport.</p>	trujilloam	11/28/2022

**Attached Documents**

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

Document Num	Description	URL
696204376	Photos, Annotation and Issues report	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5926750">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5926750</a>