

**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:

05/30/2023

Submitted Date:

06/05/2023

Document Number:

702801565

FIELD INSPECTION FORM

Loc ID Inspector Name: On-Site Inspection ☐
 480732 O'Malley, Anna 2A Doc Num: _____

Operator Information:

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
☒ FOLLOW UP INSPECTION REQUIRED
☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

17 Number of Comments

10 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
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
480732	LOCATION	AC			-	FEDERAL WMC 24-17	RI
480785	WELL	PR	04/04/2023	GW	045-24484	FEDERAL WMC 311-20	RI
480786	WELL	PR	04/12/2023	LO	045-24485	FEDERAL WMC 511-20	RI
480787	WELL	PR	04/12/2023	LO	045-24486	FEDERAL WMC 312-20	RI
480788	WELL	PR	05/30/2023	OW	045-24487	FEDERAL WMC 512-20	RI
480789	WELL	DG	10/26/2022	LO	045-24488	FEDERAL WMC 33-20	RI
480790	WELL	DG	11/04/2022	LO	045-24489	FEDERAL WMC 532-20	RI
480791	WELL	DG	12/01/2022	LO	045-24490	FEDERAL WMC 432-20	RI
480792	WELL	DG	12/07/2022	LO	045-24491	FEDERAL WMC 332-20	RI
480793	WELL	PR	04/04/2023	GW	045-24492	FEDERAL WMC 11-20	RI
480794	WELL	PR	02/01/2023	GW	045-24493	FEDERAL WMC 411-20	RI
480795	WELL	PR	04/12/2020	LO	045-24494	FEDERAL WMC 12-20	RI
480796	WELL	PR	05/30/2023	OW	045-24495	FEDERAL WMC 412-20	RI
480797	WELL	PR	05/30/2023	OW	045-24496	FEDERAL WMC 13-20	RI
480798	WELL	DG	11/11/2022	LO	045-24497	FEDERAL WMC 32-20	RI
480799	WELL	DG	11/21/2022	LO	045-24498	FEDERAL WMC 531-20	RI
480800	WELL	DG	12/13/2022	LO	045-24499	FEDERAL WMC 431-20	RI
480801	WELL	DG	12/19/2022	LO	045-24500	FEDERAL WMC 331-20	RI

General Comment:

On 05/30/2023, Reclamation Specialist O'Malley conducted a construction and stormwater inspection at TEP ROCKY MOUNTAIN LLC's FEDERAL/WMC 24-17 Location #480732 in Garfield County, Colorado.

The following compliance issues were observed during this inspection:

- Trash/debris
- Cuttings trench fence non-functioning
- Stormwater

Refer to the "Location," "Reclamation," "Stormwater" and "COGCC 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.

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Entrance sign present in compliance with Rule 605.a.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date:	
Corrective Action:		Date:	

Good Housekeeping:

Type	TRASH		
Comment:	Trash and debris from the location was observed to be widespread on location, particularly on cut and fill slopes and within stormwater BMPs to the north. A large amount of trash was also observed offsite to the north. Trash is present on the ground, in trees and bushes. Operator shall ensure that all trash is removed, including trash which is offsite, downslope and caught in trees and bushes.		
Corrective Action:	Comply with Rule 606.	Date:	05/30/2023
Type	OTHER		
Comment:	Sawdust used in the cuttings trench appears to have blown offsite and also traveled in stormwater flows downslope of the location. Sawdust is accumulating offsite, covering vegetation, degrading reference areas. Violation of 900 series rules.		
Corrective Action:	Stabilize sawdust to prevent it from leaving the location. Remove sawdust from offsite.	Date:	05/30/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type	PIT		
Comment:	Fencing around the cuttings trench at the southeast of the location is in disrepair. Fencing is non-functioning and is now debris.		
Corrective Action:	Maintain fence.	Date:	05/30/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Location ConstructionLocation ID: 480732 CDP:

Comment: Drilling and completion operations ongoing at this site. Interim reclamation has not yet been performed. Therefore, construction phase stormwater BMPs are still in place.

Corrective Action:

Date:

Form 2A COAs:

Comment:

Corrective Action:

Date:

Wildlife BMPs:

Comment:

Corrective Action:

Date:

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
		Material Handling And Spill Prevention	No

Comments: Erosion BMPs:

Other BMPs:

Portable toilets at the southwest of the location observed not to be secured to prevent a spill.

Corrective Action: Implement or modify BMPs for improved material handling and spill prevention.

Date: 05/30/202

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DITCHES

Yes

Comments: Erosion BMPs:

Perimeter stormwater ditches throughout the location are degraded and not in proper functioning condition. Ditch walls do not appear properly stabilized resulting in rill erosion and scouring and increasing sediment loads. Portions of the northern ditch are completely filled with sediment. Stormwater is exiting ditches at unplanned exits resulting in further degradation to the ditch and offsite sediment discharge and degradation.

Other BMPs:

Check dams (rock, in conjunction with bags) within the ditch are not in proper functioning condition to reduce flow velocity. Stormwater is tunneling through check dams in some areas. In other areas sediment has been deposited on top of check dams, covering them and resulting in stormwater overtopping them rather than flowing through them.

Corrective Action: Comply with Rule 1002.f; Install or repair BMPs in accordance with good engineering practices.

Date: 05/30/202

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Comments: Erosion BMPs:

Multiple sediment traps are degraded and causing offsite degradation via erosion and offsite sediment deposition. Stormwater and sediment is being improperly discharged from traps in multiple places without an engineered outlet, indicating they may be inadequate in size for the amount of stormwater they receive.

Other BMPs:

Some sediment trap inlets and outlets are armored with a geotextile liner and rip-rap. Rip-rap in inlets/outlets is degraded; some rock appears to have been lost. Inlets/outlets are not in proper functioning condition. Stormwater is overwhelming and bypassing them.

Corrective Action: Comply with Rule 1002.f; Install or repair BMPs in accordance with good engineering practices.

Date: 05/30/202

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WADDLES

Yes

Comments: Erosion BMPs:

Wattles are present along the downslope perimeter of the location. Portions of the wattle have been overtopped by sediment laden stormwater. Offsite sediment transport, and offsite degradation from sediment deposition is widespread in multiple areas.

Other BMPs:

Corrective Action: **Comply with Rule 1002.f; Install or repair BMPs in accordance with good engineering practices.**

Date: 05/30/2023

Comment:CorrectiveAction: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>480732</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480785</u>	Type: <u>WELL</u>	API Number: <u>045-24484</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480786</u>	Type: <u>WELL</u>	API Number: <u>045-24485</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480787</u>	Type: <u>WELL</u>	API Number: <u>045-24486</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480788</u>	Type: <u>WELL</u>	API Number: <u>045-24487</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480789</u>	Type: <u>WELL</u>	API Number: <u>045-24488</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480790</u>	Type: <u>WELL</u>	API Number: <u>045-24489</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480791</u>	Type: <u>WELL</u>	API Number: <u>045-24490</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480792</u>	Type: <u>WELL</u>	API Number: <u>045-24491</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480793</u>	Type: <u>WELL</u>	API Number: <u>045-24492</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480794</u>	Type: <u>WELL</u>	API Number: <u>045-24493</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480795</u>	Type: <u>WELL</u>	API Number: <u>045-24494</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480796</u>	Type: <u>WELL</u>	API Number: <u>045-24495</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480797</u>	Type: <u>WELL</u>	API Number: <u>045-24496</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480798</u>	Type: <u>WELL</u>	API Number: <u>045-24497</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480799</u>	Type: <u>WELL</u>	API Number: <u>045-24498</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480800</u>	Type: <u>WELL</u>	API Number: <u>045-24499</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>
Facility ID: <u>480801</u>	Type: <u>WELL</u>	API Number: <u>045-24500</u>	Status: <u>DG</u>	Insp. Status: <u>RI</u>

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Comment	<p>Cuttings trench present on the southeast end of the Location. Trench was constructed 10/8/2021. Form 15, Earthen Pit Report/Permit #403152682 is "In Process."</p> <p>It was observed in this inspection that the drill cuttings trench is filled with multiple piles of what appears to be cuttings. Fluid is also present within the trench.</p>			
Corrective Action	Submit a Form 27 with details on the status of the cuttings trench. Contact Area Environmental Protection Specialist for details.			Date: 07/05/2023

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, RECREATIONAL

Comment: [Operator withdrew application for Rule 502.a Variance from Rule 1003.b Reclamation requirements \(docket #220600162\) on 1/27/2023. Wells on location currently have "drilling" status. Interim reclamation is required within six \(6\) months following completion of well drilling and completion operations.](#)

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____ Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment: [Soil removal and segregation issues resolved during meeting w/ COGCC and TEP on 7/25/2022 per FIR Resolution #403072946.](#)

Corrective Action _____ Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment: [BMPs to prevent topsoil from contamination with subsoil not observed on portions of the stockpile. A straw wattle is installed around the base of the stockpile. However, it is in disrepair to the northeast and absent to west of the stockpile. In particular, the western portion of the stockpile is not adequately protected from subsoils and what appears to be cuttings trench materials.](#)

Corrective Action [Implement BMPs to protect topsoil from contamination with subsoil and cuttings trench.](#) Date **05/30/2023**

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 _____

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
		Gravel				access road is and working pad are stable
		Culverts	Fail			
		Ditches				

Comment: Access road stormwater issues observed:
 - Stormwater appears to be bypassing the access road culvert resulting in erosion degradation to the road fill and offsite sediment transport
 - Access road cut slopes unstablized: rills, slumping/sloughing

Corrective Action: Comply with Rule 1002.f; Install or repair BMPs in accordance with good engineering practices.

Date: 05/30/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>CORRECTIVE ACTION DATE COMMENTS:</p> <p>- Stormwater issues were previously observed in inspection numbers 696203718, 696203408, 696203364, 696203305 and 696203195. Operator submitted FIR Resolution #403072946 indicating all stormwater corrective actions had been addressed and attached pictures showing work completed to address previous corrective actions. Therefore, a new corrective action date is given for stormwater issues observed during this inspection.</p> <p>- The date of discovery is given for all new corrective actions. It is COGCC's expectation that Operators are in compliance with COGCC rules at all times. Therefore, the date the location was observed out of compliance is given as the corrective action date. Location will remain out of compliance until corrective actions are addressed.</p>	omalleya	06/05/2023

Attached Documents

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

Document Num	Description	URL
702801566	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6136423