

**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:

11/06/2023

Submitted Date:

11/08/2023

Document Number:

696205408

**FIELD INSPECTION FORM**Loc ID 322524 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 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:**

14 Number of Comments

6 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
, TEP		COGCCInspectionReports@terraep.com	
Kirschner, Steven		steven.kirschner@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
		dlee@nngus.com	
		dlee@nng.us.com	
Heil, John		john.heil@state.co.us	
Schroeder, Siera		siera.schroeder@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
322524	LOCATION	AC			-	Puckett MV 1-23	CI
453726	LOCATION	AC			-	CSOC TB Location	CI
453727	TANK BATTERY	AC			-	CSOC 697-14 Tank Battery	CI

**General Comment:**

On 11/6/2023, Reclamation Specialist Trujillo conducted a construction and stormwater inspection at TEP Rocky Mountain's Puckett/MV 1-23 location in Garfield County, Colorado.

TEP P&Ad the MV 1-23 well on 8/26/2013, and conducted reclamation of areas no longer necessary on the Location, leaving the remaining working pad surface for the Nonsuch's CSOC TB facility (Metershed, Separator equipment, 200 bbl condensate tank); Nonsuch was the last active Operator on the Location, and was therefore responsible for management of the remaining Location at this time.

TEP received approval on Form 4 #403318897 to re-disturb the Location for temporary use as a Frac Pad use during completion operations related to the Arco Deep 1-27 Pad; construction activities commenced 10/13/2023 per Form 42 #403556580. Pursuant to documents attached to the Sundry, TEP accepts all future reclamation and stormwater management for the Location.

Previous inspections observed that all of Nonsuch's production equipment, with exception to the Metershed, has been removed. Pursuant to document attached to the Sundry, the remaining Nonsuch Sales Meter associated with the Facility is to be relocated off of the working pad surface, to areas southwest of the Location; at time of inspection Nonsuch's Metershed has not been removed, therefore two Operators remain associated with the Location; this inspection is being submitted to both Nonsuch and TEP.

This inspection is in response to TEP's Form 42 Notice of Construction. However, this inspection is also a followup to previous inspections related to Nonsuch Natural Gas' CSOC TB Location #453726, and NOAV #403100223, to document compliance with the following Corrective Actions:

-Stormwater

It was observed in this inspection that though stormwater issues on the working pad surface has been repaired during recent construction activities, and additional measures will be implemented per TEP's SWMP to manage runoff, stormwater issues remain apparent along the access road. The original corrective action has not been resolved in its entirety and remains applicable, and at this time is being provided to both Operators.

Refer to the "Location" and "Stormwater" 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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	Location signage		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:	970-285-9377 / 911		
Corrective Action:		Date:	

<b>Good Housekeeping:</b>			
Type	TRASH		
Comment:	What appears to be torn liner material observed along northern/western the berm/fill slopes of the Location. This is considered trash debris requiring removal and proper disposal.		
Corrective Action:	Comply with Rule 606	Date:	11/06/2023

Overall Good: ☐

<b>Spills:</b>			
Type	Area	Volume	

In Containment: No

Comment:

☐ Multiple Spills and Releases?

<b>Equipment:</b>			corrective date
Type: Gas Meter Run	# 1		
Comment:	Pursuant to documents attached to Form 4 #403318897, the existing Nonsuch sales meter associated with the Nonsuch CSOC Tank Battery Facility will be removed from the working pad surface, and relocated to adjacent areas southwest of the Location; records show equipment previously associated with the battery facility include the meter identified above, separator equipment and a 200 bbl condensate tank.  Facility/Metershed equipment will require closure pursuant to Rule 911 requirements.		
Corrective Action:	Comply with Rule 911 and submit a Form 27 for O&G facility closure.  Comply with 1105 for Flowline abandonment requirements, including the Form 42 – Abandonment of Flowlines notice.		Date: 11/06/2023
Type: Other	# 1		
Comment:	Pursuant to documents attached to Form 4 #403318897, the above-ground marker associated with the P&A well will be cut off below grade per Rule 434. At time of inspection, well marker has not been removed.		
Corrective Action:		Date:	
Type: Other	# 1		
Comment:	Pursuant to documents attached to the approved Form 4 #403318897, an existing monitoring well (#658) is located along the southeastern end of the Working Pad Surface.  Monitoring well was not observed, or not apparent; unclear as to the current status of this well.		

Corrective Action:	Provide (attached to a Form 4) ECMC with an update/information/documentation regarding the current status of this monitoring well; if monitoring well has been P&A, provide records that well was properly P&A per DWR requirements.	Date:	11/06/2023
--------------------	--	-------	------------

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Location Construction**

Location ID:	322524	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
WADDLES	Yes		

Comments: Erosion BMPs: Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, erosion logs (straw wattles) have been implemented along the perimeter of the Location's disturbance, and the topsoil stockpile on the north end of the Location.

Control appeared to be in proper functioning condition at time of inspection.

Other BMPs:

Corrective Action: Date:

	No		
--	----	--	--

Comments: Erosion BMPs: Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, a "Drive-Over Berm" to contain stormwater runoff on the WPS will be constructed at the Location entrance, at the top of the "Ramp Road onto Pad".

It was observed in this that the berm has not been constructed at the Location entrance.

Other BMPs:

Corrective Action: Comply with the Form 4 SWMP and 1002.f Date: 11/06/2023

	No		
--	----	--	--

Comments: Erosion BMPs: It was observed in this inspection that control measures to stabilize the slopes of the Location, and to minimize erosion and degradation are missing or insufficient; slopes currently bare and lack stabilization.

Pursuant to Operator's SWMP attached to the approved Form 4 #403318897, "Hydromulching without seed" will be implemented at slopes along the perimeter of the Location

Other BMPs:

Corrective Action: Comply with the Form 4 SWMP and 1002.f Date: 11/06/2023

**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:	322524	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI
Facility ID:	453726	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	CI
Facility ID:	453727	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	CI

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Pursuant to Operator's Topsoil Plan attached to the approved Form 4 #403318897, an average depth of 9 inches was present on the Location, with 1416 cubic yards estimated to be salvaged.

Heavy winds prevented Reclamation Specialist from performing topsoil calculations to determine compliance with Rule 1002.b.

Determination will be performed during a future inspection.

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

Date \_\_\_\_\_

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

Comment \_\_\_\_\_

Pursuant to Operator's Topsoil Plan attached to the approved Form 4 #403318897, topsoil will be stockpiled on the west and north ends of the Location- topsoil stockpile not observed on west end of the Location

Hydromulch to minimize erosion and degradation, as well as to protect from wind and water erosion has been implemented at the topsoil stockpile on the north end of the Location; erosion logs (wattles) have been installed along the perimeter of the stockpiles.

Control measures appeared to be in proper functioning condition at time of inspection.

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 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: \_\_\_\_\_

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: <input style="width: 90%;" type="text"/>						
Corrective Action: <input style="width: 90%;" type="text"/>	Date: <input style="width: 50%;" type="text"/>					
Overall Final Reclamation <input type="checkbox"/> Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>						
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: <input style="width: 90%;" type="text" value="See 'COGCC Comments' at the end of this report."/>						Date: 07/20/2021
Corrective Action: <input style="width: 90%;" type="text" value="Install or repair required BMPs per Rule 1002.f.(2)C. Ensure control measures are installed in accordance with good engineering practices, and maintained in proper functioning condition."/>						
<b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
<b>STORMWATER COMMENTS</b>  Previous inspections (#696201797; #696201822; #696201988; #696202916; #696203087; #696203324; #696203532, #696204030; #696204553) observed that BMPs to protect and stabilize unpaved areas of the Location and access road, and to allow for proper stormwater discharge in a manner that minimizes erosion, degradation and sediment transport are missing, or insufficient; stormwater runoff resulted in erosion degradation and offsite sediment discharge at Location entrance and access road. Inspection required Nonsuch Natural Gas Inc. to comply with Rule 1002.f.(2)C. NOAV #403100223 was issued 07/08/2022 also requiring compliance with Rules and corrective actions.  It was observed in this inspection that though stormwater issues on the working pad surface have been repaired during recent construction activities, and additional measures will be implemented per TEP's SWMP to manage runoff, stormwater issues along the access road have not been addressed. The original corrective action and date will remain applicable.	trujilloam	11/07/2023

**Attached Documents**

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

Document Num	Description	URL
403589016	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315287">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315287</a>
696205409	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315277">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315277</a>