

**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:

01/16/2024

Submitted Date:

01/18/2024

Document Number:

696205539**FIELD INSPECTION FORM**Loc ID 335174 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 96850Name of Operator: TEP ROCKY MOUNTAIN LLCAddress: 1058 COUNTY ROAD 215City: PARACHUTE State: CO Zip: 81635**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**11 Number of Comments3 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
,		COGCCInspectionReports@terraep.com	<a href="#">TEP</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
262536	WELL	PR	09/27/2002	GW	045-08035	CLOUGH RMV 139-21	RI
280515	WELL	PR	07/20/2006	GW	045-11268	CLOUGH RWF 342-21	RI
280516	WELL	PR	07/20/2006	GW	045-11269	CLOUGH RWF 442-21	RI
280517	WELL	PR	07/20/2006	GW	045-11270	CLOUGH RWF 341-21	RI
280518	WELL	PR	07/20/2006	GW	045-11271	CLOUGH RWF 441-21	RI
335174	LOCATION	AC			-	CLOUGH-66S94W 21SENE	RI

**General Comment:**

On 1/16/2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountain LLC's CLOUGH-66S94W/21SENE location in Garfield County, Colorado.

Location is within High Priority Habitat.

The following compliance issues were observed during this inspection:

-Stormwater

-Interim Reclamation

Refer to the "Location", "Reclamation" and "Stormwater" section of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Corrective Action dates provided will either be back-dated to when Operator should have been in compliance, or when Operator was initially observed to be out of compliance; 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; a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

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

Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	

**Emergency Contact Number:**

Comment: 970-285-9377 / 911

Corrective Action:

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

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type	WELLHEAD		
Comment:	Hog Panels		
Corrective Action:		Date:	
Type	SEPARATOR		
Comment:	Hog Panels		
Corrective Action:		Date:	
Type	TANK BATTERY		
Comment:	Hog Panel Fencing at the tank battery observed to be in disrepair.		
Corrective Action:	Maintain fence	Date:	01/16/2024

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS	
Comment:						
Corrective Action:					Date:	

**Paint**

Condition		
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Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth				Inadequate	
Comment:	Shares containment with 80 bbl produced water tank. See stormwater regarding containment berm.				
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	<100 BBLS	STEEL AST		,
Comment:					
Corrective Action:				Date:	

**Paint**

Condition	
Other (Content)	
Other (Capacity)	80 bbl
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth				Inadequate
Comment:	Shares containment with 200 bbl condensate tank. See stormwater regarding containment berm.			
Corrective Action:				Date:

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:



**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 \_\_\_\_\_

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

Date \_\_\_\_\_

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? PassProduction areas stabilized ? Fail

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? FailProduction areas have been stabilized? Fail Segregated soils have been replaced? \_\_\_\_\_**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-CroplandTop soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation Fail

## 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? I

Comment It was observed in this inspection that there are interim areas on to the east and west of the well pad that are not progressing towards 1003 standards; areas are predominantly bare, and erosion degradation is evident; BMPs to stabilize soils are inadequate (see stormwater). Additional reclamation efforts shall be made before the 2024 local growing season.

Corrective Action Comply with 1003 rules and conduct additional reclamation within interim areas not progressing towards reclamation standards. Implement stormwater and erosion control BMPs in accordance with 1002.f to protect and stabilize the seeded soils. Continue to monitor and manage interim areas until location receives a passing final reclamation inspection.

Date 01/16/2024Overall Interim Reclamation Fail**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: 95%;" type="text"/>															
Corrective Action: <input style="width: 95%;" 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>															
<table border="1" style="width: 100%; border-collapse: collapse;"><thead><tr><th style="width: 12.5%;">Loc Erosion BMPs</th><th style="width: 12.5%;">BMP Maintenance</th><th style="width: 12.5%;">Lease Road Erosion BMPs</th><th style="width: 12.5%;">Lease BMP Maintenance</th><th style="width: 12.5%;">Chemical BMPs</th><th style="width: 12.5%;">Chemical BMP Maintenance</th><th style="width: 25%;">Comment</th></tr></thead><tbody><tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr></tbody></table>	Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment								
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment									
Comment: <input style="width: 95%;" type="text" value="See 'Stormwater' under COGCC Comments at the end of this report."/>															
Corrective Action: <div style="border: 1px solid black; padding: 5px; color: red;">Comply with Rule 1002.f- install or repair required stormwater and erosion control measures in accordance with good engineering practices to minimize erosion, degradation and off-site sediment transport; maintain BMPs in proper functioning condition. Regrading alone at the working pad surface will be inadequate.  Comply with Rule 606.d and remove plastic trash/debris due to improper/unmaintained erosion logs implemented at the location.</div>															
Date: 01/16/2024															
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT															

<b>COGCC Comments</b>		
Comment	User	Date
<b>STORMWATER COMMENT</b>  It was observed in this inspection that stormwater and erosion control BMPs are missing or insufficient on the Location:  -BMPs to stabilize the working pad surface are no longer in proper functioning condition; control measures to minimize tracking inadequate; control measures to minimize off-site sediment transport by equipment, such as vehicle tracking pad, also not observed.  -Erosion degradation observed at slopes within the interim areas of the Location; BMPs to properly manage runoff, as well as to minimize erosion and degradation within the interim areas are inadequate.  -Erosion logs (straw wattles) have not been installed per good engineering practices or maintained in proper functioning condition; Stormwater observed cutting beneath erosion logs resulting in degradation. Erosion logs placed within interim areas appear to be constructed with a plastic material, were observed to be in disrepair and are considered debris subject to Rule 606.d requirements.  -BMPs to manage runoff at the tank battery facility is inadequate; stormwater degradation evident at berms of the battery, allowing stormwater to enter the containment measure; gully erosion forming between facility and access road.	trujilloam	01/18/2024

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

Document Num	Description	URL
403659583	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6398767">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6398767</a>
696205540	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6398721">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6398721</a>