

**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:

03/06/2024

Submitted Date:

03/08/2024

Document Number:

696205667

**FIELD INSPECTION FORM**

Loc ID: 335174      Inspector Name: Trujillo, Aaron      On-Site Inspection:       2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 96850  
Name of Operator: TEP ROCKY MOUNTAIN LLC  
Address: 1058 COUNTY ROAD 215  
City: PARACHUTE      State: CO      Zip: 81635

**Findings:**

- 9 Number of Comments
- 1 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	TEP

**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 3/06/2024, 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.

This inspection is a follow-up to #696205539 to document compliance with the following corrective actions:

- Stormwater
- Fence in disrepair.
- Reclamation

This inspection is also in response to Resolution #403689334 stating corrective action related to fence maintenance has been resolved.

It was observed in this inspection that the corrective actions per inspection #696205547 related to fence maintenance have been resolved; corrective actions related to reclamation and stormwater remain outstanding.

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

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

**Location**

Overall Good:

**Signs/Marker:**

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

**Emergency Contact Number:**

Comment: [970-285-9377 / 911](tel:970-285-9377)

Corrective Action:

Date:

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Fencing/:**

Type	TANK BATTERY		
Comment:	<a href="#">Hog Panels</a> <a href="#">Maintenance corrective action per inspection #696205539 has been resolved.</a>		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:	<a href="#">Hog Panels</a>		
Corrective Action:		Date:	
Type	SEPARATOR		
Comment:	<a href="#">Hog Panels</a>		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			

Corrective Action:	Date:
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**Inspected Facilities**

Facility ID: 262536 Type: WELL API Number: 045-08035 Status: PR Insp. Status: RI

Facility ID: 280515 Type: WELL API Number: 045-11268 Status: PR Insp. Status: RI

Facility ID: 280516 Type: WELL API Number: 045-11269 Status: PR Insp. Status: RI

Facility ID: 280517 Type: WELL API Number: 045-11270 Status: PR Insp. Status: RI

Facility ID: 280518 Type: WELL API Number: 045-11271 Status: PR Insp. Status: RI

Facility ID: 335174 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**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? \_\_\_\_\_ 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 Refer to inspection #696205539 for CA regarding reclamation prior to the 2024 local growing season.

This corrective action remains applicable.

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

Overall 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:

Corrective Action:  Date \_\_\_\_\_

Overall Final Reclamation _____	Well Release on Active Location <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>
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<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: <a href="#">See "COGCC Comments" at the end of this report.</a>						Date: _____
Corrective Action: <span style="color: red;">Corrective actions per inspection #696205539: 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. Comply with Rule 606.d and remove plastic trash/debris due to improper/unmaintained erosion logs implemented at the location.</span>						
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

**COGCC Comments**

Comment	User	Date
<p><b>STORMWATER COMMENT</b></p> <p>Inspection #696205539 observed that stormwater and erosion control BMPs were missing or insufficient on the Location:</p> <p style="color: blue;">-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.</p> <p>Inspection required Operator to comply with Rules 1002.f. and 606.d.</p> <p>It was observed in this inspection that the following portions of the corrective action have been resolved:</p> <p style="color: blue;">-BMPs to stabilize the working pad surface have been maintained. BMPs to manage runoff at the tank battery have been maintained; containment berm has been maintained.</p> <p>The following corrective actions remain outstanding:</p> <p style="color: blue;">-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 remain missing or insufficient.</p> <p style="color: blue;">-Erosion logs (straw wattles) have not been installed per good engineering practices or maintained in proper functioning condition; erosion degradation has persisted. Erosion logs in disrepair constructed with plastic material have not been removed and per 606 requirements.</p> <p>The stormwater corrective action per inspection #696205539 has not been addressed in its entirety, and remains applicable.</p>	trujilloam	03/08/2024

**Attached Documents**

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

Document Num	Description	URL
696205668	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6459057">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6459057</a>