

**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:

08/16/2024

Submitted Date:

08/20/2024

Document Number:

696206148**FIELD INSPECTION FORM**Loc ID 323916 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**ECMC 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:4 Number of Comments1 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
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Arthur, Denise		denise.arthur@state.co.us	
Smelser, Wayne		wayne.smelser@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
211205	WELL	PR	05/15/1995	GW	045-06964	CLOUGH RMV 32-21	RI
323916	LOCATION	AC			-	CLOUGH-66S94W 21NWSW	RI

General Comment:

On 8/16/2024, Reclamation Specialist Trujillo conducted a stormwater inspection at TEP Rocky Mountain LLC's CLOUGH-66S94W/21NWSW location in Garfield County, Colorado.

Location is within High Priority Habitat.

This inspection is a follow-up to #696205659 to document compliance with the following corrective actions:

-Stormwater / Surface disturbance minimization

It was observed in this inspection that corrective actions remain outstanding.

Refer to the Location, Reclamation 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 inspection that have not been addressed are still applicable.

Reclamation - Storm Water - Pit

Storm Water:

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

Comment: See "COGCC Comments" at the end of this report.

Corrective Action: Corrective Action per Inspection #696205659:
Comply with 1002 Rules.

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Inspection #696205659 observed that stormwater and erosion control BMPs were missing or insufficient on the Location:</p> <p>-BMPs to stabilize the working pad surface, and access road north of the Location, 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.</p> <p>-Outlets on the eastern areas of the pad have not been installed or maintained in accordance with good engineering practice; degradation at the controls evident. There are areas along the east end of the Location where stormwater runoff from the pad is apparent, resulting in erosion degradation and off-site sediment transport/deposition.</p> <p>-The access road north of the Location has not been constructed with a properly engineered stream crossing; vehicle tracking and degradation apparent at the crossing, impacting a riverine system and Waters of the State. Stream is a direct tributary to the Colorado river.</p> <p>Inspection required Operator to comply with 1002 Rules by 3/15/2024.</p> <p>It was observed in this inspection that BMPs to stabilize, minimize erosion, degradation, sediment transport, and impacts to riverine systems have not been installed or maintained per good engineering practices pursuant to Rules 1002.e and 1002.f:</p> <p>-BMPs to stabilize, as well as to minimize tracking and sediment transport at the working pad surface of the Location remain missing or insufficient. Gravel appears to have only been implemented along the western areas of the site to address tracking and stabilization concerns; gravel has largely filled with sediment and has not been maintained; unable to observe evidence that BMPs had been implemented to address stabilization and tracking concerns within the eastern half of the working pad surface.</p> <p>-BMPs on the east end of the Location to properly manage runoff remain missing or insufficient: Outlets have not been installed or maintained per good engineering practices; BMPs to properly divert stormwater to the outlet and sediment trap are also missing, insufficient and/or not per good engineering practice resulting in persisting erosion, degradation and sediment transport.</p> <p>-BMPs to stabilize, as well as to minimize erosion, degradation and tracking/sediment transport along the access road have not been installed or maintained per good engineering practice; tracking and degradation issues have persisted. Operator only appears to have conducted grading operations at road resulting in sediment being pushed around; grading alone is insufficient.</p> <p>-A properly engineered stream crossing, and other stormwater and erosion control BMPs, have not been installed or maintained along the access road, resulting in persisting degradation, tracking issues and impacts to a riverine system.</p> <p>Corrective Actions have not been addressed and remain applicable.</p>	trujilloam	08/20/2024

Attached Documents

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

Document Num	Description	URL
403894620	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6671838
696206149	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6671758