

**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:

08/04/2025

Submitted Date:

08/12/2025

Document Number:

718100726

**FIELD INSPECTION FORM**

Loc ID 335177 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:**

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

**Findings:**

- 7 Number of Comments
- 3 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
,		ECMCInspectionReports@flywheelenergy.com	TEP
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Burn, Diana		diana.burn@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
335177	LOCATION	AC			-	DOE-66S96W 36SWNE	RI

**General Comment:**

On 08/4/2025, Western Reclamation Work Lead Trujillo and NW Reclamation Specialist Gaasche conducted a joint inspection with NW Compliance Specialist Smelser at TEP Rocky Mountain LLC's DOE-66S96W/36SWNE location in Garfield County, Colorado.

Location is Fed Surface, Fed Mineral.

Location is within the following High Priority Habitats: Elk Winter Concentration Area; Mule Deer Severe Winter Range; Mule Deer Winter Concentration Area

Location is in close proximity to the following High Priority Habitats: Aquatic Sportfish Management Waters; Elk Severe Winter Range.

Location is also within a Rule 411.a "Surface Water External Buffer", and upstream from a Rule 411.b GUDI Source.

**SUMMARY:**

On 3/9/2022, ECMC Staff observed areas on the slopes of the south end of the Location have begun to slough, resulting in an imminent threat to the stability of the working pad and production facilities, as well as to public health, safety, welfare and the environment. ECMC Staff expressed concerns about a potential spill originating from below-ground dump-lines or flow-lines at the facility equipment, and required TEP to investigate the cause resulting in the destabilization of the slopes (Document No. 696203469).

TEP Submitted Resolution No. 403012323 indicating successful pressure testing of lines from the pad, that soil samples from the seep areas were tested showing non-detect results for hydrocarbon and PAH, and that TEP met with BLM on 4/6/2022 (as the owner/administrator of the Location) to evaluate site conditions and to determine future actions.

Pursuant to BLM records, on 5/9/2023 TEP met with BLM Natural Resource Specialist (Wesley Toews) and a 3rd party Geotechnical Engineering Group (John Withers, Grand Valley Consulting) to evaluate surface conditions (See attached "Geotechnical Report").

Per the Report, slope instability concerns were discovered in the north and west sides of the pad surface, in addition to the south end; likely due to seasonal precipitation and snow melt. Recommendations per the report included conducting a site specific geotechnical investigation performed by a geotechnical engineer to more fully evaluate soil related movements at the site.

Per BLM's Environmental Surface Inspection report (attached) submitted in response to the site visit, TEP was directed to submit a sundry to the BLM with stabilization plans for the south side of the pad.

On 8/4/2025, ECMC Staff observed that the slope instability on the south end of the Location has persisted, resulting in a landslide event and mass-soil migration; including a ~30 foot section of the working pad surface.

On 8/11/2025 ECMC Reclamation Staff met with BLM representatives regarding the observed issues. Based on this discussion, the ECMC is directing TEP to perform the following:

-Pursuant to the 5/14/2023 Geotechnical Report recommendations, TEP will conduct a site specific geotechnical investigation (performed by a geotechnical engineer) of the Location; pursuant to the 5/9/2023 BLM inspection report, TEP will also prepare a site specific, engineer-stamped "Stabilization Plan" in order to remove the materials fallen from the Location into the drainage below, and to address and repair the areas of slope instability and failure on the south side of the Location (and all other areas of concern identified within the Geotechnical Investigation Report).

-TEP will be required to submit the "Geotechnical Investigation Report", and the engineer-stamped "Location Stabilization Plans" to both the ECMC and the BLM for review. The Report and Plans will be attached together, and submitted via each respective agency's "Sundry Form".

-TEP will be required to implement the plan to repair and stabilize the Location by a date TBD by the Director, upon approval of the Sundry notice.

Refer to the photo-documentation attached to this report.

Any corrective action(s) from previous inspection that have not been addressed are still applicable.

**Location**

Overall Good:

**Signs/Marker:**

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

Emergency Contact Number:

Comment:

Corrective Action:

Date:

**Good Housekeeping:**

Type			
Comment:	Open-ended pipes observed within areas of the wells; BMPs to prevent wildlife access to the pipes missing or insufficient.		
Corrective Action:	Comply with RUIe 902.b	Date:	08/19/2025
Type			
Comment:	Various trash, debris and/or unused equipment observed on the Location.		
Corrective Action:	Comply with Rule 606.	Date:	08/19/2025

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 335177 Type: LOCATION API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**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 See "SUMMARY" within the "General Comment" section at the beginning of this report.

Corrective Action See "COGCC Comments" at the end of this Report for corrective actions related to Location Stabilization.

Date 09/12/2025

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  Multi-Well Location

**ECMC Comments**

Comment	User	Date
<p><b>CORRECTIVE ACTION:</b></p> <p>Pursuant to Rule 210.a:</p> <p>TEP shall conduct a site specific "Geotechnical Investigation" (performed by a geotechnical engineer) of the Location. Based on findings during the investigation, TEP shall also prepare a site specific, engineer-stamped "Stabilization Plan" in order to remove the materials fallen from the Location into the drainage below, and to address and repair the areas of slope instability and failure on the south side of the Location (and all other areas of concern identified within the Geotechnical Investigation Report).</p> <p>TEP shall submit both the "Geotechnical Investigation Report", and the engineer-stamped "Location Stabilization Plan" to both the ECMC and the BLM for review; the Report and Plans will be attached together, and submitted via each respective agency's "Sundry Form".</p>	trujilloam	08/12/2025

**Attached Documents**

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

Document Num	Description	URL
404313951	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184734">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184734</a>
718100727	5/9/2023 BLM ES Inspection Report	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184718">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184718</a>
718100728	5/14/2023 Geotechnical Engineering Group report	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184719">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184719</a>
718100729	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184720">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7184720</a>