

**FORM
INSP**Rev
X/15**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:

04/03/2019

Submitted Date:

05/29/2019

Document Number:

690900061

FIELD INSPECTION FORMLoc ID 421192 Inspector Name: FISCHER, ALEX On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: PO BOX 370

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

8 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 |
|----------------|-------|------------------------------------|-----------------|
| Arauza, Steven | | steven.arauza@state.co.us | |
| Colby, Lou | | lou.colby@state.co.us | |
| Rocky, TEP | | COGCCInspectionReports@terraep.com | All Inspections |
| Heil, John | | john.heil@state.co.us | |
| Gardner, Mike | | mgardner@terraep.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|------|--------|-------------|------------|---------|---------------|-------------|
| 414560 | PIT | AC | | | - | 44-16-694 | EI |

General Comment:

On April 3, 2019 COGCC Environmental Staff (Alex Fischer, Steven Arauza, and John Heil) conducted a field inspection of TEP Rocky Mountain LLC (TEP) Pit Facility ID: 414560. Weather was overcast and temperature app 50 degree F. See the Inspectors/Comments tab.

LocationOverall Good: ☐

| | | | |
|----------------------|--|-------|--|
| Signs/Marker: | | | |
| Type | OTHER | | |
| Comment: | Entrance sign in incorrect and reads "OGCC Pit Number: 421192. Note, this is the Location ID Number and the Pit Facility Number is 414560. | | |
| Corrective Action: | | Date: | |

Emergency Contact Number:

| | | |
|--------------------|--|-------------|
| Comment: | | Date: _____ |
| Corrective Action: | | |

Good Housekeeping:

| | | | |
|--------------------|--|-------|------------|
| Type | UNUSED EQUIPMENT | | |
| Comment: | Valves, pipes, pails, near manifold and ASTs. | | |
| Corrective Action: | Comply with Rule 603.f . | Date: | 05/29/2019 |
| Type | DEBRIS | | |
| Comment: | Straw bale debris near entrance to the Pit Facility. | | |
| Corrective Action: | Comply with Rule 603.f . | Date: | 06/09/2019 |

Overall Good: ☐

| | | | |
|--------------------|--|--------|------------------|
| Spills: | | | |
| Type | Area | Volume | |
| Other | Truck Loadout | | |
| Comment: | Staining of gravel beneath pipe covered with plastic sheeting and duct tape. | | |
| Corrective Action: | Control and contain spills/releases and clean up per Rule 906.a. | | Date: 05/29/2019 |

In Containment: No

Comment: ☐ Multiple Spills and Releases?

| | | | |
|--------------------|---|--|------------------|
| Fencing/: | | | |
| Type | PIT | | |
| Comment: | An approximate 3-foot hole in fencing/netting.NOTE: This was repaired on 4/3/2019. Other gaps in fencing/netting around pipe penetrations noted. | | |
| Corrective Action: | Net or fence pit to prevent access per rule 902.d. NOTE: This was repaired on 4/3/2019. | | Date: 05/31/2019 |

Venting:

| | | | |
|--------------------|--|-------|--|
| Yes/No | | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Flaring:

| | | |
|----------|--|--|
| Type | | |
| Comment: | | |

| | | | |
|--------------------|--|-------|--|
| Corrective Action: | | Date: | |
|--------------------|--|-------|--|

Environmental**Spills/Releases:**

Type of Spill: OTHER E&P WASTE

Estimated Spill Volume: _____

Comment:

- Gravel discoloration and apparent drip from pipe with plastic sheeting and duct tape.
- Gravel discoloration near 5-gallon pail.

Corrective Action: Control and contain spills/releases and clean up per Rule 906.a.

Date: 05/29/2019

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat

Long

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

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

| Loc Erosion BMPs | BMP Maintenance | Lease Road Erosion BMPs | Lease BMP Maintenance | Chemical BMPs | Chemical BMP Maintenance | Comment |
|------------------|-----------------|-------------------------|-----------------------|---------------|--------------------------|---------|
| Other | In Process | | | | | |

Comment: Erosional rills and failed stormwater BMPs along hillside outside and north of the pit facility. Migration of sediments into the pit.

Corrective Action: Install or repair required BMPs per Rule 1002.f.

Date: 05/29/2019

Pits: ☐ NO SURFACE INDICATION OF PIT

Type: Multiwell Reuse/ Recycling

Lined: YES

Pit ID: 414560

Lat: 39.520530

Long: -107.888400

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: HDPE

Liner Condition: Adequate

Comment: Three 12-inch bubbles noted in the liner along the west side of pit.

Corrective Action

Date:

Fencing:

Fencing Type: Netting/Fence com

Fencing Condition: Inadequate

Comment: Gaps in wire strand fence near southeast corner. Entrance gate open.

Corrective Action

Date: 06/05/2019

Netting:

Netting Type: Fence/Net Combo

Netting Condition: Gaps

Comment: Gaps in net around pipe penetrations.

Corrective Action

Date: 06/05/2019

Anchor Trench Present: YES

Oil Accumulation: YES

2+ feet Freeboard: YES

Comment:

Corrective Action

Date:

Monitoring:

Monitoring Type

Comment

None

No leak detection monitoring observed.

COGCC Comments

| Comment | User | Date |
|--|----------|------------|
| <p>On April 3, 2019 COGCC Environmental Staff (Alex Fischer, Steven Arauza, and John Heil) conducted a field inspection of TEP Rocky Mountain LLC (TEP) Pit Facility ID: 414560. Weather was overcast and temperature app 50 degree F.</p> <p>The following is a summary:</p> <ul style="list-style-type: none"> • The Clough Production Pit is an approximate 117,800 bbls produced water pit; • Access gates were open at the time of the inspection; • Entrance sign is incorrect and reads "OGCC Pit Number: 421192. Note, this is the Location ID Number and the Pit Facility Number is 414560; • A four strand barbed wire fence surrounds the pit facility complex; • A 10 foot fire lane and 10 foot buffer lane are absent; • A pump trailer present with hoses being supported by poly pipe supports and a concrete block; • Temporary cribbing of wood blocks support the manifold system; • Unused equipment near the manifold system (valve with piping) and near the ASTs; • Hoses placed directly on pit liner; • At the time of the inspection, fluids were flowing into the pit facility; • Booms on fluid surface with hydrocarbon sheen; • Gaps (6-8 inches) in netting/fencing at poly pipe penetrations; • Three approximate 12-inch size bubbles in pit liner on the west side of the pit complex; • Metal trash/debris noted in southwest corner of pit facility; • Potential migration of sediment into the pit facility throughout the entire pit facility; • An approximate 2-3 foot gap in the fence beneath the lower wire in the southwest corner of the pit facility; • Unused equipment near the pump trailer and ASTs; • Erosional rills and failed stormwater BMPs along hillside outside and north of the pit facility; • An approximate 3-foot hole in fence/netting in northwest corner of the pit facility (Note, the operator was contacted via phone on 4/3/2019 and repairs made on that same day); • An approximate 300-gallon AST and 1000-gallon AST inside of secondary containment; • Gravel discoloration and apparent drip from pipe with plastic sheeting and duct tape; • Gravel discoloration near 5-gallon pail; • Apparent used BMPs) straw bales stored outside of the pit facility about 50-feet from the entrance. <p>No leak detection monitoring was observed.</p> | fischera | 05/29/2019 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|---|---|
| 402058229 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4834566 |
| 690900062 | INSP Photo Clough Production Pit Facility 414560 20190403 | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4834561 |