

**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:

04/16/2021

Submitted Date:

04/26/2021

Document Number:

696202576

FIELD INSPECTION FORMLoc ID 475753 Inspector Name: Trujillo, Aaron 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:

5 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 | All Inspections |
| , | | dnr_cogccenforcement@state.co.us | |
| Byers, Jim | | jbyers@blm.gov | Mesa, Garfield, Gunnison |
| Arthur, Denise | | denise.arthur@state.co.us | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|---------|------------------|-------------|
| 475753 | LOCATION | AC | | | - | FEDERAL PA 31-26 | RI |

General Comment:

On 4/16/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountain's Federal /PA 31- 26 location in Garfield County, Colorado.

This inspection is also follow up to #696201365, #696202163 and #696202522 to document compliance with the following corrective actions:
1002.f: Stormwater.

This inspection is also a follow up to "CA Completed" resolution #402654156.

The following compliance issues were observed during this inspection:
1002.f: Stormwater and permit conditions.

Refer to the "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 inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

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" for comments regarding stormwater.](#)Corrective Action: [Install or repair required BMPs per Rule 1002.f.\(2\)C](#)

Date: 06/25/2020

Pits: ☐ NO SURFACE INDICATION OF PIT**COGCC Comments**

| Comment | User | Date |
|---|------------|------------|
| <p>STORMWATER COMMENTS</p> <p>FIR #696201365, #696202163 and #696202522 documented that the Location was out of compliance with Stormwater rules; BMPs missing or insufficient to manage runoff/runon, protect/stabilize cut slopes; BMPs insufficient at access access road; BMPs missing to protect the intermittent stream, and to stabilize access road at stream crossing.</p> <p>It was observed in this inspection that stormwater and erosion controls measures remain missing, insufficient or inadequate based on the site's conditions in accordance with Rule 1002.f.(2)C:</p> <ul style="list-style-type: none"> - Operator has installed slope roghening (terrace grading) and hydromulch, as well as rock armoring along sections of the cut slope that receives concentrated runon flows. It was observed that the soils along the terrace remain insufficiently stabilized and protected. Armoring does not appear to be appropriate in size to stabilize/protect the slopes, and has not been installed with geotextile lining in accordance with good engineering practices. Operator has installed erosion logs as a runon control measures on a few sections of the Location's western perimeter; erosion logs are not an appropriate control measure for areas with concentrated flows, additionally, erosion logs do not appear to have been properly backfilled to prevent water movement under the control measure; BMPs inadequate to stabilize/protect slopes. See photos 4-17 -Previous inspection observed that the stormwater ditch and berm along the western end of the pad was not in proper functioning condition. It was observed in this inspection that sediment has been removed from the ditch, however, the berm remains improperly installed in accordance with good engineering practices; berm has not been properly compacted; loose soils at berm is considered a pollutant source that will contribute to sediment-laden stormwater discharge. See photos 20-21. -Control measures to stabilize/protect unpaved areas of the current production area remain missing or insufficient. See photos 1-2. - Per Form 2A #401513496 permit condition #4, "Stormwater BMP's will include perimeter controls such as sediment traps, diversion ditches, check dams, waddles, and others control measures necessary to control stormwater run-on and run-off and minimize offsite movement of sediment". Runon controls remain missing or insufficient on the Location; in addition to Rule 1002.f, Location is also out of compliance with permit conditions. See photos 11, 18-19. -Hydromulch observed along areas of cut slopes of the access road remain degraded; control measures to stabilize/protect slopes of the access road remain missing or insufficient. See photos 24-25. - Sediment traps observed on the Location and access road have not been installed in accordance with good engineering practices. See photos 3, 27-29. Additionally, runon concentrated flow into the sediment trap on Location is coming from a ~12 acre area; sediment trap does not appear to be sufficient in size. -Previous inspections observed that BMPs per good engineering practices remain missing to protect the waterway, and to stabilize the access road at the stream crossing. It was observed in this inspection that additional work has been performed at the intermittent stream crossing; it seems unlikely that the work conducted will provide long term stlization to the waterway; control measure is not adequate, or an appropriate BMP to prevent sediment/pollutant deposition from vehicles and equipment traveling through the intermittent stream and drainage. See photos 26, 30-31 -Erosion log previously observed filled with sediment within the channel downstream remains in place; control measure is not appropriate for stream channels, will discharge the collected sediment while degrading, and requires removal. See photo 32. <p>Corrective actions have not been addressed and remain applicable.</p> | trujilloam | 04/21/2021 |

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------------------------------|---|
| 696202606 | Inspection Photos and Issues report | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5413217 |