

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

05/26/2021

Submitted Date:

06/08/2021

Document Number:

699700256

## FIELD INSPECTION FORM

 Loc ID 335087 Inspector Name: Heil, John 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:**

- 10 Number of Comments  
 6 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
Fischer, Alex		alex.fischer@state.co.us	
Gardner, Mike		mgardner@terraep.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
210759	WELL	PR	12/30/1986	GW	045-06517	ARCO MV-9-32	EI
280519	WELL	PR	10/06/2005	GW	045-11272	PUCKETT GM 213-32	EI
280520	WELL	PR	03/01/2006	GW	045-11273	PUCKETT GM 422-32	EI
280521	WELL	PR	02/28/2006	GW	045-11274	PUCKETT GM 423-32	EI
280522	WELL	PR	02/27/2006	GW	045-11275	PUCKETT GM 323-32	EI
297716	WELL	PR	04/30/2009	GW	045-16924	PUCKETT GM 424-32	EI
297717	WELL	PR	08/13/2008	GW	045-16925	PUCKETT GM 524-32	EI
297718	WELL	PR	08/13/2008	GW	045-16926	PUCKETT GM 324-32	EI
297719	WELL	PR	08/13/2008	GW	045-16927	PUCKETT GM 623-32	EI
297720	WELL	PR	08/13/2008	GW	045-16928	WILLIAMS GM 314-32	EI
479988	TANK BATTERY	AC	05/13/2021		-	MV 9-32-696 Tank Battery	EI
479989	SPILL OR RELEASE	AC	05/13/2021		-	SPILL/RELEASE POINT	EI

**General Comment:**

On May 26, 2021, COGCC Environmental Staff (John Heil) conducted an environmental field inspection of TEP ROCKY MOUNTAIN LLC (TEP operator #96850) MV 9-32 PAD Location ID 335087 and Spill/Release ID 479989. See 5/25/2021 Inspection Doc #699700255 for additional information.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

Overall Good:

**Spills:**

Type	Area	Volume			

In Containment: No

Comment:

Multiple Spills and Releases?

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE		200 BBLs	STEEL AST		

Comment: It appears that all wells associated with the tank battery are producing to the newly installed 200 bbl, Steel AST condensate tank.

Corrective Action:

Date:

Paint

Condition:

Other (Content)

Other (Capacity)

Other (Type)

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Inadequate	Walls Insufficient	Base Insufficient	Inadequate

Comment: The northwest area of the tank battery is missing the metal support for the liner. Multiple, various sized tears and hole were observed in the liner of the secondary containment structure. Multiple tears and hole were marked by orange spray paint. Tank battery secondary containment is in disrepair.

Corrective Action: Repair or install berms or other secondary containment devices per Rule 603.o. Install liner material to ensure spill or released materials will be maintained within the containment structure. The CA date was determined from 30-days after the discovery of the Spill/Release.

Date: 06/11/2021

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type	<input type="text"/>
Comment:	<input type="text"/>
Corrective Action:	<input type="text"/>
Date:	<input type="text"/>

**Location Construction**

Location ID: 335087 CDP: \_\_\_\_\_

**Comment:** It appears that the locaiton has been expanded with the construction of the Land Treatment area.

**Corrective Action:** Comply with Rule 304.a.(2). CA date is based on 5/26/2021 Inspection (Doc #699700256) when the Land Treatment area was observed on location.

**Date:** 06/26/2021

**Form 2A COAs:**

**Comment:** \_\_\_\_\_

**Corrective Action:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Wildlife BMPs:**

**Comment:** Based on COGIS Maps, it appears that Spill/Release ID 479989 and the associated Land Treatment area are within a High Priority Habitat Area.

**Corrective Action:** Operator shall comply with Rule 913.b.(5).B.

**Date:** 06/15/2021

**Comment:** \_\_\_\_\_

**Corrective Action:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**On Site Inspection (305):**

Surface Owner Contact Information:

Name: \_\_\_\_\_ Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Operator Rep. Contact Information:

Landman Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Date Onsite Request Received: \_\_\_\_\_ Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

LGD Contact Information:

Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Agreed to Attend: \_\_\_\_\_

Summary of Landowner Issues:

\_\_\_\_\_

Summary of Operator Response to Landowner Issues:

\_\_\_\_\_

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

\_\_\_\_\_

**Inspected Facilities**

Facility ID: <u>210759</u>	Type: <u>WELL</u>	API Number: <u>045-06517</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>280519</u>	Type: <u>WELL</u>	API Number: <u>045-11272</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>280520</u>	Type: <u>WELL</u>	API Number: <u>045-11273</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>280521</u>	Type: <u>WELL</u>	API Number: <u>045-11274</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>280522</u>	Type: <u>WELL</u>	API Number: <u>045-11275</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>297716</u>	Type: <u>WELL</u>	API Number: <u>045-16924</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>297717</u>	Type: <u>WELL</u>	API Number: <u>045-16925</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>297718</u>	Type: <u>WELL</u>	API Number: <u>045-16926</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>297719</u>	Type: <u>WELL</u>	API Number: <u>045-16927</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>297720</u>	Type: <u>WELL</u>	API Number: <u>045-16928</u>	Status: <u>PR</u>	Insp. Status: <u>EI</u>
Facility ID: <u>479988</u>	Type: <u>TANK</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>479989</u>	Type: <u>SPILL OR</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>

**Environmental**

**Spills/Releases:**

Type of Spill: CONDENSATE

Estimated Spill Volume: 130

Comment: Date of Discovery of the Spill/Release was 05/11/2021. 10-day Form 19 Supplemental (Doc #402703455) required per Rule 912.b.(4) was submitted on 6/1/2021, 21 days after the discovery date. The Form 19 Supplemental (Doc #402703455) did not include information required under 912.b.(4).

Corrective Action: Operator shall submit a Form 19 Supplemental with ALL information required per Rule 912.b.(4).

Date: 05/21/2021

Reportable: YES

GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_

Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Waste Management:**

Type	Management	Condition	GPS (Lat) (Long)
Oily Soil	Land Treatment	Inadequate	
Comment	5/26/2021 COGCC staff observed a Land Treatment area on location that was not previously present during the 5/25/2021 Inspection Doc #699700255. The Land Treatment area is located north of the excavation and the MV 9-32 PAD. The Land Treatment area material is 1-3 feet thick and is contained within an earthen berm. COGCC staff observed some potential staining and a strong hydrocarbon odor was present at time of inspection. Operator submitted a Form 27 (Doc #402703249) on 06/01/2021 that states "An additional 140 yards of soil that contained a lower TPH concentration were placed within a landfarm onsite as shown in the landfarm map."		
Corrective Action	Rule 905.e.(2) states: "Prior to commencing any Land Treatment, Operators will submit and obtain approval of a Form 27." Operator did not submit and obtain approval of a Form 27 prior to commencing any Land Treatment.		Date: <u>05/25/2021</u>
	Operator shall submit an Form 27 per Rule 905.e.(2). CA date is based on 5/25/2021 Inspection (Doc #699700255) before the Land Treatment area was present on location.		

**Spill/Remediation:**

Comment: 5/26/2021 COGCC staff observed an excavation measuring approximately 20 feet x 20 feet x 20 feet (LxWxH). The excavation and Land Treatment area appears to be in the flow path of un-named dry arroyo that runs adjacent (west) to the MV 9-32 PAD. Additional potentially impacted material was observed underneath the liner of the secondary containment structure around the northwest corner of the tank battery. See photo log for details.

Corrective Action: Operator shall comply with Rule 913.b.(5).

Date: \_\_\_\_\_

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**COGCC Comments**

Comment	User	Date
It appears that the Land Treatment area is partially off-site and is built across an un-named, dry arroyo. Operator is not in compliance with 905.e.(1).B.	heilj	06/03/2021

**Attached Documents**

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

Document Num	Description	URL
402711793	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450137">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450137</a>
699700260	20210526 Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450136">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450136</a>