

**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:

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.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		
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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		
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: CONDENSATEEstimated 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: 05/21/2021Reportable: YES

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: _____

Waste Management:

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Land Treatment	Inadequate		
Comment	<u>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."</u>			
Corrective Action	<u>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.</u> <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.</u>			Date: <u>05/25/2021</u>

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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450137
699700260	20210526 Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5450136