

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:

11/21/2022

Submitted Date:

11/22/2022

Document Number:

696204363

FIELD INSPECTION FORM

 Loc ID 439690 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:
 OGCC Operator Number: 96850
 Name of Operator: TEP ROCKY MOUNTAIN LLC
 Address: 1058 COUNTY ROAD 215
 City: PARACHUTE State: CO Zip: 81635
Findings:

- 20 Number of Comments
 5 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
		ATankersley@terraep.com	
Heil, John		john.heil@state.co.us	
O'Malley, Anna		anna.omalley@state.co.us	
Dupire, Matt		mdupire@blm.gov	BLM Meeker
, TEP		COGCCInspectionReports@terraep.com	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
316596	LOCATION	AC			-	Federal RGU 23-35-198	CI
439690	LOCATION	AC			-	Pitchers Mound Water Recycling Pit 13-35-198	CI
481438	CENTRALIZED EP WASTE MGMT FAC	AP	01/20/2022		-	Pitcher's Mound WRF	CI

General Comment:

On 11/21/2022, Reclamation Specialists Trujillo and O'Malley conducted a joint construction and stormwater inspection at TEP's Pitchers Mound RF Location in Rio Blanco County, Colorado.

Construction of the Pitchers Mound WRF has resulted in the expansion of the Federal RGU 23-35-198 Location (ID #316596). However, during the permitting/OGDP process, a second Location ID was created on this site (Pitchers Mound Water Recycling Pit 13-35-198, #439690); the pit facility is currently related to two Location IDs existing at the same site.

It was observed in this inspection that soil salvage operations and pad expansion appear to have been completed; pit construction has not yet commenced.

Location/Pit facility constructed on Federal (BLM) surface.

This inspection is a follow-up to inspection #696204147 to document compliance with the following corrective actions:

- Signage at wells
- Soil Removal and Segregation
- Protection of soil

It was observed in this inspection that the location remains out of compliance with rules and corrective actions.

The following new compliance issues were observed during the inspection:

- Signage / Labeling
- Stormwater

Refer to the "Location Construction", "Location" and "Reclamation" and "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.

Location

Overall Good:

Signs/Marker:

Type	TANK LABELS/PLACARDS		
Comment:	3 tanks at the battery facility observed missing required labeling.		
Corrective Action:	Install sign to comply with Rule 605.h.	Date:	12/22/2022
Type	WELLHEAD		
Comment:	Previous inspection observed permanent signage observed missing from the wells. Inspection required Operator to install sign. It was observed that permanent signage have been installed at the wellheads. This CA has been addressed.		
Corrective Action:		Date:	
Type	BATTERY		
Comment:	Tank battery facility installed at the northeast end of the Location. Battery missing required signage.		
Corrective Action:	Install sign to comply with Rule 605.e.	Date:	12/22/2022

Emergency Contact Number:

Comment: 970-285-9377, Location sign

911 emergency

Corrective Action:

Date:

Good Housekeeping:

Type	DEBRIS		
Comment:	Unused t-post and high visibility fence observed stored behind shed/tank battery on the south end of the Location. Unused pallets observed stored at toe of cut slopes adjacent to the separator equipment.		
Corrective Action:	Comply with Rule 606.	Date:	11/29/2022

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:	

Location Construction

Location ID: 439690

CDP: _____

Comment: With use of a sUAS, Reclamation Specialist calculated the disturbance area of the Location to be 15.37 acres; this comports with the Form 2A permitted disturbance area.

Corrective Action:

Date: _____

Form 2A COAs:

Comment:

Corrective Action:

Date: _____

Wildlife BMPs:

Comment:

Corrective Action:

Date: _____

Stormwater:

Erosion BMPs	Present	Other BMPs	Present
DITCHES	Yes		

Comments: Erosion BMPs: Stormwater diversion ditch constructed along the Location's perimeter; BMP has been constructed with appropriate slope and consolidation. Hydromulch has been used in conjunction with consolidation.

Other BMPs: Erosion log velocity checks installed within ditch.

Corrective Action: _____ Date: _____

RETENTION PONDS	Yes		

Comments: Erosion BMPs: Sediment traps have been constructed at the north end of the Location, as well as on the northwest, northeast corner and southeast corners of the Location. BMPs appear to have been constructed in accordance with good engineering practices, with a properly engineered and armored inlets/outlets.

Other BMPs:

Corrective Action: _____ Date: _____

	Yes		

Comments: Erosion BMPs: Hydromulch observed at the two topsoil stockpiles on the Location, as well as at the stormwater diversion ditch along the perimeter of the Location. BMP was intact and in proper functioning condition at time of inspection.

Other BMPs:

Corrective Action: _____ Date: _____

		Material Handling And Spill Prevention	Yes

Comments: Erosion BMPs: Material handling and spill prevention BMPs observed at porta-john on Location.

Other BMPs:

Corrective Action: _____ Date: _____

	Yes		

Comments: Erosion BMPs: Culvert installed at the northeastern location entrance; culverts observed onsite, though not yet installed at northwest entrance.

Other BMPs:

Corrective Action: _____ Date: _____

	Vehicle Trakcing	No
Comments: Erosion BMPs:	See "Stormwater Comments" at Under COGCC Comments at the end of this report.	
Other BMPs:		
Corrective Action:	Comply with 1002.f.	Date: 11/22/2022
		2
WADDLES	Yes	
Comments: Erosion BMPs:	Erosion logs (wattles) implemented along perimeter of the Location. BMP has been used in conjunction with other controls such as a perimeter stormwater diversion ditch, hydromulch and sediment traps. BMP appears to have been installed per good engineering requirements and is in proper functioning condition.	
Other BMPs:	Erosion logs implemented at base of the two topsoil stockpiles; BMP implemented per good engineering requirements, and in proper functioning condition at time of inspection.	
Corrective Action:		Date:
Comment:		
Corrective Action:		Date:
On Site Inspection (305):		
<u>Surface Owner Contact Information:</u>		
Name: _____	Address: _____	
Phone Number: _____	Cell Phone: _____	
<u>Operator Rep. Contact Information:</u>		
Landman Name: _____	Phone Number: _____	
Date Onsite Request Received: _____	Date of Rule 306 Consultation: _____	
Request LGD Attendance: _____		
<u>LGD Contact Information:</u>		
Name: _____	Phone Number: _____	Agreed to Attend: _____
<u>Summary of Landowner Issues:</u>		
<u>Summary of Operator Response to Landowner Issues:</u>		
<u>Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:</u>		

Inspected Facilities

Facility ID: 316596 Type: LOCATION API Number: - Status: AC Insp. Status: CI

Facility ID: 439690 Type: LOCATION API Number: - Status: AC Insp. Status: CI

Facility ID: 481438 Type: CENTRALIZE API Number: - Status: AP Insp. Status: CI

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: RANGELAND

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment Fence installed along perimeter of the Location.

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION Fail

Comment See "Soil Removal and Segregation" Under COGCC Comments at the end of this report.

Corrective Action Operator is directed to conduct a review of topsoil salvage operations conducted on the Location during construction activities, to evaluate compliance with Rule 1002.b.(2). Operator shall submit their findings attached to a Form 4 to NW Reclamation Specialist Trujillo. Submittal of this plan does not constitute compliance with 1002.b.(2) topsoil salvage requirements, an additional evaluation by COGCC Staff will be made upon submittal of the information and COGCC observations.

Date 10/19/2022

1002c. PROTECTION OF SOILS In Process

Comment Previous inspection observed unstabilized soil stockpiles missing BMPs to minimize erosion and sediment transport. Inspection required Operator to implement BMPs.

It was observed in this inspection that the soils have been replaced, and are no longer stockpiled; CA is no longer applicable, though it is noted that no documentation or resolution has been submitted by the Operator documenting that Operator complied with the corrective action.

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

Corrective Action

Date _____

Overall Interim Reclamation

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND _____

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

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Inspection #696204147 observed that construction of the Location was “in process”, and that BMPs to stabilize the slopes of the Location, including the cut slopes will be required to ensure slopes remain protected, and to minimize erosion/degradation.</p> <p>It was observed in this inspection that pad expansion appears to have been completed, and construction activities is no longer "on-going". It was also observed that BMPs to minimize erosion, degradation, and to stabilize the slopes and soils of the eastern interim areas of the Location, and the cut slopes on the east end of the Location are missing or insufficient. BMPs are now required; Temporary BMPs to stabilize soils along the interim are required until interim reclamation work is performed, and long term stabilization has been achieved.</p> <p>It was also observed in this inspection that the current working pad areas of the Location have not been adequately stabilize, and BMPs to minimize tracking and vehicle sediment transport are missing or insufficient- unconsolidated soils and rutting observed.</p>	trujilloam	11/22/2022
<p>SOIL SALVAGE AND SEGREGATION COMMENTS</p> <p>Inspection #696204147 documented apparent soil salvage discrepancies: 8.43 acres was disturbed on the west end of the Location during new construction activities. Inspection #696204147 noted that, in accordance with Rule 1002.b.(2), if Operator salvaged a minimum of 6 inches, 6,793 cubic yards of topsoil should have been salvaged and stored; this translates to a stockpile with 8,152 expected cubic yards due to a 20% swell factor; Inspection observed that only 5,272 (4,219 CY pre-20% swell factor) cubic yards of topsoil was observed stored at the western topsoil stockpile. Inspection required Operator to conduct a review of topsoil salvage Operations to evaluate compliance with Rule 1002.b.(2), and to submit their findings attached to a Form 4 by 10/19/2022; submittal of this plan does not constitute compliance with 1002.b.(2) topsoil salvage requirements.</p> <p>Additionally, it is being noted that during a site visit by Reclamation Specialist O'Malley on 8/25/2022, a topsoil depth of 10 inches was observed within the western areas of the Location; pursuant to 1002.b.(2), all topsoil is required to be salvaged and stored; therefore, at 10 inches, 10,445 cubic yards of topsoil (excluding areas where soils are stockpiled) would have been expected to be salvaged, resulting in an observed stockpile of 12,534 cubic yards due to a 20% swell factor.</p> <p>It was observed in this inspection that additional salvage efforts appear to have been performed; with use of a sUAS, 7,287 cubic yards of material was observed stored on the west end of the Location; an additional 2,000 cubic yards appears to have been salvaged and stored. However, it is noted that the amount of soil salvaged and stored still remains less than if the required 10 inches of topsoil was salvaged throughout the western areas of the Location.</p> <p>Operator has also failed to submit their “Review of Topsoil Salvage” per the corrective action.</p>	trujilloam	11/22/2022

Attached Documents

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

Document Num	Description	URL
696204364	Inspection Photos and issue report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5923528