

**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:

09/06/2023

Submitted Date:

09/08/2023

Document Number:

696205234

FIELD INSPECTION FORM

Loc ID Inspector Name: On-Site Inspection ☐
 316591 Trujillo, Aaron 2A Doc Num: _____

Operator Information:

OGCC Operator Number: 96850

Name of Operator: TEP ROCKY MOUNTAIN LLC

Address: 1058 COUNTY ROAD 215

City: PARACHUTE State: CO Zip: 81635

Status Summary:

- ☐ THIS IS A FOLLOW UP INSPECTION
☒ FOLLOW UP INSPECTION REQUIRED
☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

11 Number of Comments
 7 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
Burchett, Kirby		kirby.burchett@state.co.us	
, 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
287172	WELL	PR	08/01/2021	GW	103-10906	FEDERAL RG 41-18-297D	RI
316591	LOCATION	AC			-	FEDERAL RG 41-18-297	RI
478377	WELL	PR	06/01/2023	GW	103-12460	FEDERAL RG 42-18-297	RI
478378	WELL	PR	10/13/2022	GW	103-12461	FEDERAL RG 443-18-297	RI
478379	WELL	PR	06/01/2023	GW	103-12462	FEDERAL RG 342-18-297	RI
478380	WELL	PR	10/11/2022	GW	103-12463	FEDERAL RG 344-7-297	RI
478381	WELL	PR	10/12/2022	GW	103-12464	FEDERAL RG 443-7-297	RI
478382	WELL	PR	02/01/2023	GW	103-12465	FEDERAL RG 543-18-297	RI
478383	WELL	PR	10/12/2022	GW	103-12466	FEDERAL RG 544-7-297	RI
478384	WELL	PR	10/12/2022	GW	103-12467	FEDERAL RG 543-7-297	RI
478385	WELL	PR	10/13/2022	GW	103-12468	FEDERAL RG 442-18-297	RI
478386	WELL	PR	10/12/2022	GW	103-12469	FEDERAL RG 444-7-297	RI
478387	WELL	PR	10/12/2022	GW	103-12470	FEDERAL RG 341-18-297	RI
478388	WELL	PR	10/12/2022	GW	103-12471	FEDERAL RG 44-7-297	RI
478389	WELL	PR	06/01/2023	GW	103-12472	FEDERAL RG 541-18-297	RI
478390	WELL	PR	06/01/2023	GW	103-12473	FEDERAL RG 542-18-297	RI
478391	WELL	PR	06/01/2023	GW	103-12474	FEDERAL RG 343-18-297	RI
478392	WELL	PR	10/12/2022	GW	103-12475	FEDERAL RG 43-7-297	RI

General Comment:

On 9/6/2023, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at TEP Rocky Mountains Federal RG 41-18-297 Location in Rio Blanco County, Colorado.

Location is within a sensitive area and High Priority Habitat Mule Deer Severe Winter Range; Location in close proximity to High Priority Habitat Mule Deer Winter Concentration Area, Aquatic Sportfish Management Waters, and Aquatic Native Species Conservation Waters.

It was observed in this inspection that corrective actions per inspection nos. 702501009 dated 3/15/2023, and 702501718 dated 8/9/2023 have not been resolved; CAs remain applicable. Refer to inspections for additional details.

The following new compliance issues were observed per this inspection:

-Interim Reclamation.

Refer to the "Location", and "Reclamation" 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; The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved and a follow up inspection will be conducted to ensure the compliance issues have been corrected to comply with ECMC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	DEBRIS		
Comment:	<p>Inspection #702501718 observed debris on the Location. Corrective actions per the inspection state "at not time will trash, debris, or rubbish be placed or remain on the ground".</p> <p>Trash and debris remain apparent on the Location; this CA has not been addressed and remain applicable.</p>		
Corrective Action:	<p>At no time will trash, debris, or rubbish be placed or remain on the ground.</p> <p>Comply with 606 Rules.</p>	Date:	<u>08/17/2023</u>
Type	STORAGE OF SUPL		
Comment:	<p>Inspection #702501718 observed supplies and equipment stored on the Location. Corrective actions per the inspection state "The storage, placement, or maintenance of equipment, vehicles, trailers, commercial products, chemicals, drums, totes, containers, materials, and all other supplies not necessary for use on an Oil and Gas Locations is prohibited".</p> <p>It was observed that supplies and equipment not needed for production remain improperly stored on the Location. This CA has not been addressed and remains applicable.</p>		
Corrective Action:	<p>The storage, placement, or maintenance of equipment, vehicles, trailers, commercial products, chemicals, drums, totes, containers, materials, and all other supplies not necessary for use on an Oil and Gas Locations is prohibited.</p>	Date:	<u>08/25/2023</u>
Type	WEEDS		
Comment:	<p>Inspection #702501718 observed Undesirable Plant Species on the Location. Corrective actions per the inspection state "Maintain noxious weed control on all disturbed and reclaimed areas as a result of Oil & Gas activities including access roads".</p> <p>It was observed in this inspection that Undesirable Plant Species, such as Kochia, and Salsola sp. remain established on the Location. This CA has not been addressed and remains applicable.</p>		
Corrective Action:	<p>Maintain noxious weed control on all disturbed and reclaimed areas as a result of Oil & Gas activities including access roads.</p> <p>Comply with Rule 606.c</p>	Date:	<u>08/17/2023</u>

Overall Good: ☐

Spills:				
Type	Area	Volume		
Comment:	<p>Inspection #702501718 observed stained soils on the Location, including several areas between frac tanks and on line at entrance to Location. Inspection required Operator to Remove and properly dispose of oily waste and impacted soil.</p> <p>It was observed in this inspection that stained soils have not been removed. This CA has not been addressed and remains applicable.</p>			
Corrective Action:	<p>Remove and properly dispose of oily waste and impacted soil.</p> <p>Clean/remediate to table 915-1 cleanup concentrations.</p>			Date: <u>08/24/2023</u>

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type			
Comment:	Fence observed at the topsoil stockpile has not been maintained in a proper functioning condition.		
Corrective Action:	Maintain fence or comply with 606 rules and remove.		Date: 09/06/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities				
Facility ID: <u>287172</u>	Type: <u>WELL</u>	API Number: <u>103-10906</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>316591</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478377</u>	Type: <u>WELL</u>	API Number: <u>103-12460</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478378</u>	Type: <u>WELL</u>	API Number: <u>103-12461</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478379</u>	Type: <u>WELL</u>	API Number: <u>103-12462</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478380</u>	Type: <u>WELL</u>	API Number: <u>103-12463</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478381</u>	Type: <u>WELL</u>	API Number: <u>103-12464</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478382</u>	Type: <u>WELL</u>	API Number: <u>103-12465</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478383</u>	Type: <u>WELL</u>	API Number: <u>103-12466</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478384</u>	Type: <u>WELL</u>	API Number: <u>103-12467</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478385</u>	Type: <u>WELL</u>	API Number: <u>103-12468</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478386</u>	Type: <u>WELL</u>	API Number: <u>103-12469</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478387</u>	Type: <u>WELL</u>	API Number: <u>103-12470</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478388</u>	Type: <u>WELL</u>	API Number: <u>103-12471</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478389</u>	Type: <u>WELL</u>	API Number: <u>103-12472</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478390</u>	Type: <u>WELL</u>	API Number: <u>103-12473</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478391</u>	Type: <u>WELL</u>	API Number: <u>103-12474</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>478392</u>	Type: <u>WELL</u>	API Number: <u>103-12475</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>

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 _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

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? FailComment [See "Good Housekeeping".](#)

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? PassComment [Cuttings trench closed via F27](#)

Corrective Action _____

Date _____

Guy line anchors marked? FailComment [Anchors observed on location missing required marking.](#)Corrective Action [Mark anchors in accordance with Rule 1003.a. If anchors are not needed on the Location, remove in accordance with 606 Rules.](#)Date **09/06/2023**

1003b. Area no longer in use? Fail Production areas stabilized ? _____

1003c. Compacted areas have been cross ripped? Fail

1003d. Drilling pit closed? Pass Subsidence over on drill pit? _____

Cuttings management: Cuttings trench- closed.

1003e. Areas no longer needed for drilling or subsequent operations for have been re-vegetated to 80% of pre-existing? Fail

Production areas have been stabilized? _____ Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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? F

Comment Records show all wells on Location have been drilled; rig on Location was released 7/28/2021; all wells were completed and produced by 11/1/2021. Pursuant to 1003 Rules, interim reclamation of the Location was required by 5/2022.

Interim reclamation has not been performed on Location; areas not necessary for production have not been decompacted, recontoured and regraded; topsoil has not been replaced and revegetation activities have not been performed; unused equipment or equipment not necessary for production activities remain improperly stored on the Location; Undesirable Plant Species have not been properly managed on the Location.

This Location is currently 16 months out of compliance with ECMC interim reclamation requirements.

Corrective Action Comply with 1003 rules and perform interim reclamation. Ensure stormwater and erosion control BMPs to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation are implemented and maintained prior to construction activities, and ensure control measures to stabilize the seeded soils are installed and maintained until long-term stabilization is achieved.

A CA date of 5/1/2022 is being provided as this is the date interim reclamation of the Location was required by.

Date 05/01/2022

Overall Interim Reclamation Fail

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
Interim reclamation has not been performed per the Interim Reclamation and Stormwater Control Plan #402398678.	trujilloam	09/08/2023
Per to Form 2A, Location's disturbance to be reduced to 1.35 acres.		

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

Document Num	Description	URL
696205235	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6246164