



On 9/6/2023, Reclamation Specialist Trujillo inspected TEP Rocky Mountain's Pitchers Mound RF Location in Rio Blanco County, Colorado.

Construction of the Pitchers Mount 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 pit construction has not yet commenced.

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

This inspection is a follow-up to inspection #696204147 and #696204363 to document compliance with the following corrective actions:

- Signage
- Good Housekeeping
- Stormwater

It was observed in this inspection that the Location remains out of compliance with ECMC Rules and Corrective Actions.

The following new compliance issues were observed during this inspection:

- Signage
- Stormwater
- F28 condition requirements.

Refer to the "Location", "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; 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.

**Location**

Overall Good:

<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	Sign not posted at the Federal RGU 522-35-198 (API 103-11492)		
Corrective Action:	Comply with Rule 605.d	Date:	09/06/2023
Type	TANK LABELS/PLACARDS		
Comment:	CA requiring compliance with 605.h has been resolved.		
Corrective Action:		Date:	
Type	BATTERY		
Comment:	CA requiring compliance with 605.e has been resolved.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	Location		
Corrective Action:		Date:	

Emergency Contact Number:			
Comment:	970-285-9377		Date:
Corrective Action:		Date:	

<b>Good Housekeeping:</b>			
Type	UNUSED EQUIPMENT		
Comment:	Good Housekeeping CA per inspection #696204363 has been resolved.  It was observed in this inspection that culverts observed in previous inspection have not been installed and remain stored on the northwest end of the Location; culverts are unused equipment.		
Corrective Action:	Comply with 606 rules.	Date:	09/06/2023

Overall Good:

<b>Spills:</b>			
Type	Area	Volume	

In Containment: No

Comment:

Multiple Spills and Releases?

<b>Fencing/:</b>			
Type	LOCATION		
Comment:	Location perimeter.		
Corrective Action:		Date:	

<b>Equipment:</b>			corrective date
Type: Other	#		

<b>Comment:</b>	<p><b>TANK BATTERY FACILITY</b></p> <p>Pursuant to Form 28 #2573117 Conditions of Approval, a Form 27 shall be submitted for all production equipment prior to relocation and/or decommissioning per Rule 911.a. (4).</p> <p>The tank battery facility and separator equipment previously located on the west end of the Federal RGU 23-35-198 working pad surface has been relocated to the east end of the Location.</p> <p>Unable to find records that a Form 27 has been submitted prior to the relocation and/or decommissioning per Rule 911.a.(4), and as required by the COAs.</p>		
<b>Corrective Action:</b>	<b>Comply with Form 28 COAs.</b>	<b>Date:</b>	<u>09/06/2023</u>
<b>Type: Other</b>	<b># 3</b>		
<b>Comment:</b>	<p>Pursuant to Form 28 #2573117 Conditions of Approval, Operator was required to install 3 monitoring wells within 90 days of the Form 28 approval.</p> <p>Form 28 was approved June 23, 2022.</p> <p>Unable to find evidence that monitoring wells have been installed.</p>		
<b>Corrective Action:</b>	<b>Comply with Form 28 COAs.</b>	<b>Date:</b>	<u>09/06/2023</u>

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	300 BBLS	STEEL AST		,
<b>Comment:</b>					
<b>Corrective Action:</b>					<b>Date:</b>

Paint

<b>Condition</b>					
<b>Other (Content)</b>					
<b>Other (Capacity)</b>					
<b>Other (Type)</b>					

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
<b>Comment:</b>	Shares containment with 2 condensate tanks.			
<b>Corrective Action:</b>				
				<b>Date:</b>

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	2	300 BBLS	STEEL AST		,
<b>Comment:</b>					
<b>Corrective Action:</b>					<b>Date:</b>

Paint

<b>Condition</b>					
<b>Other (Content)</b>					
<b>Other (Capacity)</b>					
<b>Other (Type)</b>					

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate	
Comment:	Containment BMP appeared to be in proper functioning condition at time of inspection.				
Corrective Action:				Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:			Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Location Construction**

Location ID: 439690 CDP: \_\_\_\_\_

Comment:

Corrective Action:  Date: \_\_\_\_\_

**Form 2A COAs:**

**Comment:**

Corrective Action:  Date: \_\_\_\_\_

**Wildlife BMPs:**

**Comment:**

Corrective Action:  Date: \_\_\_\_\_

**Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
RETENTION PONDS			
Comments: Erosion BMPs:	Sediment traps appeared to be in proper functioning condition at time of inspection.		
Other BMPs:	<input type="text"/>		
Corrective Action:			Date: _____
		Material Handling And Spill Prevention	Yes
Comments: Erosion BMPs:	Porta-john on Location secured		
Other BMPs:	<input type="text"/>		
Corrective Action:			Date: _____
DITCHES	Yes		
Comments: Erosion BMPs:	Stormwater ditch on the north end of the Location has filled with sediment and is no longer in proper functioning condition to divert stormwater to the sediment traps on the north and eastern ends of the Location.		
Other BMPs:	<input type="text"/>		
Corrective Action:	Comply with Rule 1002.f- Install or repair BMPs per good engineering practices and maintain in proper functioning condition.		Date: 09/06/2023

Comments: Erosion BMPs: Stormwater runoff has resulted in erosion degradation to the slopes at the northern location entrance. Slopes within these areas have not been adequately armored and/or protected to properly manage runoff from the working pad surface.

Other BMPs:

Corrective Action: Comply with Rule 1002.f- Install or repair BMPs per good engineering practices and maintain in proper functioning condition. Date: 09/06/2023

WADDLES

Comments: Erosion BMPs: Location perimeter. Soil stockpiles.

Other BMPs:

Corrective Action: Date:

SLOPE ROUGHENING

Comments: Erosion BMPs: Stormwater runoff has resulted in erosion and sediment transport from the bare areas on the west end of the Location; surface roughening previously implemented within these areas has filled with sediment and is no longer in proper functioning condition.

Other BMPs:

Corrective Action: Comply with Rule 1002.f- Install or repair BMPs per good engineering practices and maintain in proper functioning condition. Date: 09/06/2023

Comment: See "Stormwater Comments" at Under COGCC Comments at the end of this report

Corrective Action: Comply with 1002.f. Date: 11/19/2022

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: 301963 Type: WELL API Number: 103-11492 Status: PR Insp. Status: PR

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

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

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 \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS In Process

Comment Erosion Logs / Hydromulch appeared to be in proper functioning condition at time of inspection. Desirable vegetation observed establishing on western soil stockpile.  
Vegetation observed on the southeastern soil stockpile was predominantly Undesirable Plant Species such as cheatgrass, tumble mustard. Any desirable plant establishment was observed only at the base of the stockpile. Additional measures will likely be necessary, and ongoing weed management required, to prevent weed establishment in accordance with Rule 1002.c.  
A followup will be conducted in the 2024 growing season to determine compliance with Rule 1002.c.

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><b>STORMWATER COMMENTS</b></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>Inspection #696204363 observed that pad expansion has been completed, and construction activities are no longer "on-going". Inspection also observed that BMPs to minimize erosion, degradation, at the cut slopes on the east end of the Location are missing or insufficient. Inspection required Operator to comply with Rule 1002.f and to implement and maintain y BMPs at the cut slopes. Inspection also observed areas of the working pad 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> <p>It was observed in this inspection that BMPs remain missing or insufficient to minimize erosion and degradation at the cut slopes. Unstabilized/unconsolidated soils, as well as tracking/rutting remain apparent on the eastern working pad surface of the Location. CA has not been addressed and remains applicable.</p>	trujilloam	09/07/2023

**Attached Documents**

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

Document Num	Description	URL
403523559	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244622">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244622</a>
696205223	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244620">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244620</a>