

**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:

09/07/2023

Document Number:

696205222

FIELD INSPECTION FORMLoc ID 439690 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 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:

21 Number of Comments

8 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
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
, TEP		COGCCInspectionReports@terraep.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
301963	WELL	PR		GW	103-11492	FEDERAL RGU 522-35-198	PR
316596	LOCATION	AC			-	Federal RGU 23-35-198	CI
439690	LOCATION	AC			-	Pitchers Mound Water Recycling Pit 13-35-198	RI
481438	CENTRALIZED EP WASTE MGMT FAC	AP	01/20/2022		-	Pitcher's Mound WRF	CI

General Comment:

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.

LocationOverall Good: ☐

Signs/Marker:			
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

Corrective Action:

Date: _____

Good Housekeeping:

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: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type	LOCATION		
Comment:	Location perimeter.		
Corrective Action:		Date:	

Equipment:

Type: Other	#		corrective date
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Comment:	TANK BATTERY FACILITY 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). 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. 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.			
Corrective Action:	Comply with Form 28 COAs.		Date:	09/06/2023
Type: Other	# 3			
Comment:	Pursuant to Form 28 #2573117 Conditions of Approval, Operator was required to install 3 monitoring wells within 90 days of the Form 28 approval. Form 28 was approved June 23, 2022. Unable to find evidence that monitoring wells have been installed.			
Corrective Action:	Comply with Form 28 COAs.		Date:	09/06/2023

Tanks and Berms:

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

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate	
Comment:	Shares containment with 2 condensate tanks.				
Corrective Action:				Date:	
Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	2	300 BBLS	STEEL AST		,
Comment:					
Corrective Action:					Date:

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

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: _____			
Corrective Action: _____			Date: _____
		Material Handling And Spill Prevention	Yes
Comments: Erosion BMPs: Porta-john on Location secured			
Other BMPs: _____			
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: _____			
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:	<u>301963</u>	Type:	<u>WELL</u>	API Number:	<u>103-11492</u>	Status:	<u>PR</u>	Insp. Status:	<u>PR</u>
Facility ID:	<u>316596</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>439690</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>481438</u>	Type:	<u>CENTRALIZE</u>	API Number:	<u>-</u>	Status:	<u>AP</u>	Insp. Status:	<u>CI</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 _____

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 REVEGETATIONCropland

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
STORMWATER COMMENTS 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. 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. 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.	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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244622
696205223	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6244620