

**FORM  
INSP**Rev  
X/15**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:

08/31/2020

Submitted Date:

09/02/2020

Document Number:

696201679

**FIELD INSPECTION FORM**

Loc ID 324457	Inspector Name: Trujillo, Aaron	On-Site Inspection <input type="checkbox"/>	2A Doc Num: _____	<b>Status Summary:</b> <input checked="" type="checkbox"/> THIS IS A FOLLOW UP INSPECTION <input checked="" type="checkbox"/> FOLLOW UP INSPECTION REQUIRED <input type="checkbox"/> NO FOLLOW UP INSPECTION REQUIRED  <b>Findings:</b> 4 Number of Comments 1 Number of Corrective Actions <input checked="" type="checkbox"/> Corrective Action Response Requested
<b>Operator Information:</b> OGCC Operator Number: 10515 Name of Operator: GUNNISON ENERGY LLC Address: 1801 BROADWAY #1150 City: DENVER State: CO Zip: 80202				<b>ANY CORRECTIVE ACTION(S) FROM PREVIOUS INSPECTIONS THAT HAVE NOT BEEN ADDRESSED ARE STILL APPLICABLE</b>

**Contact Information:**

Contact Name	Phone	Email	Comment
		heather.lang@oxbow.com	
		jessica.donahue@oxbow.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
211686	WELL	PA	06/05/2015	GW	051-06008	FEDERAL 11-90-7	RI
324457	LOCATION	CL			-	FEDERAL-611S90W 7NENE	RI

**General Comment:**

On 8/31/2020, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Gunnison Energy's Federal 11-90-7 location in Gunnison County, Colorado.

This inspection is a followup to Inspection #680600788, and #696201332 to document compliance with the following corrective actions:

- Comply with 1004 series rules by October 15, 2016
- Comply with Rule 1004.e and conduct weed management by 6/13/2020

This inspection is also in response to Resolution #402430239 stating weed management was conducted 6/5/2020.

It was observed in this inspection that weed management activities appear to have been conducted.

It was also observed that corrective actions requiring final reclamation in accordance with 1004 series rules have not been addressed; Due to the significant nature, extent, or duration of this alleged rule violation, this Location is being referred for enforcement.

Refer to the "Reclamation" section 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 on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	<p>Inspection #696201332 observed noxious weeds establishing on the Location, and required Operator to comply with Rule 1004.e.</p> <p>It was observed in this inspection that noxious weed management activities appear to have been conducted, however some plants observed appear to have reached seed head maturity by the time weed management was conducted, and seed head dispersal is evident.</p> <p>Ongoing noxious weed monitoring/management is required until location receives a passing final reclamation inspection. Followups will be conducted in future growing seasons to determine compliance with 1004 rules.</p>		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>211686</u>	Type:	<u>WELL</u>	API Number:	<u>051-06008</u>	Status:	<u>PA</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>324457</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>CL</u>	Insp. Status:	<u>RI</u>

**Reclamation - Storm Water - Pit****Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

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? \_\_\_\_\_

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: \_\_\_\_\_

Reminder: \_\_\_\_\_

Comment: \_\_\_\_\_

Well plugged \_\_\_\_\_ Pit mouse/rat holes, cellars backfilled \_\_\_\_\_

Debris removed \_\_\_\_\_ No disturbance /Location never built \_\_\_\_\_

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed \_\_\_\_\_

Gravel removed **Fail**

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured \_\_\_\_\_

Compaction alleviation **Fail** Dust and erosion control \_\_\_\_\_

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage \_\_\_\_\_

Weeds present In Process Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: [See "COGCC Comments" for comments regarding final reclamation.](#)

Corrective Action: **Comply with COGCC 1004 reclamation rules** Date **10/15/2016**

Overall Final Reclamation **Fail** Well Release on Active Location ☐ Multi-Well Location ☐

**COGCC Comments**

Comment	User	Date
<p><b>RECLAMATION COMMENTS</b></p> <p>FIR #680600788 dated 6/9/2016 and FIR #696201332 observed that the Location does not meet 1004 reclamation requirements; Equipment remains, Location and access road requiring compaction alleviation and contouring. FIRs required Operator to perform the following corrective actions by 10/25/2016: Equipment needs to be removed and well pad and access road need to be de-compacted, re-contoured, and seeded to comply with 1004 series rules by October 15, 2016.</p> <p>It was observed in this inspection that the Location remains out of compliance with 1004 Rules and corrective actions; Anchor equipment remains on NW corner of Location; Gravel remains on Location and access road; Location and access road has not been contoured and compaction alleviation not conducted and site/road revegetated.</p> <p>Corrective actions from FIR #680600788 and FIR #696201332 have not been addressed, therefore corrective action date remains applicable; Due to the significant nature, extent, or duration of this alleged rule violation, this Location is being referred for enforcement.</p>	trujilloam	09/02/2020

**Attached Documents**

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

Document Num	Description	URL
402480372	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5237415">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5237415</a>
696201680	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5237411">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5237411</a>