

**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:

07/21/2021

Submitted Date:

07/26/2021

Document Number:

696202956**FIELD INSPECTION FORM**Loc ID 324457 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10515Name of Operator: GUNNISON ENERGY LLCAddress: 1801 BROADWAY #1150City: DENVER State: CO Zip: 80202**Status Summary:**

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

**Findings:**5 Number of Comments1 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
		heather.lang@oxbow.com	
		tyson.johnston@oxbow.com	
Arthur, Denise		denise.arthur@state.co.us	

**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	PA
324457	LOCATION	CL			-	FEDERAL-611S90W 7NENE	RI

**General Comment:**

On 6/15/2021, Reclamation Specialist Trujillo conducted a final reclamation and storm water inspection at Gunnison Energy's Federal 11-90-7 location in Gunnison County, Colorado.

This inspection is a followup to:

#680600788 dated 6/9/2016;

#696201332 dated 5/26/2020;

#696201679 dated 8/31/2020;

#696202031 dated 11/19/2020;

#696202709 dated 5/21/2021;

and #696202824 dated 6/15/2021 to document compliance with the following corrective actions:

-Comply with 1004 series rules by October 15, 2016.

-Comply with Rule 1004.e by 7/1/2021

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

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; due to the nature, extent, or duration of the alleged rule violations, Location is being considered for enforcement.

A follow up inspection on this site will be conducted to ensure the compliance issues

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: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	<p>Inspection #696202824 observed noxious weeds on the southeastern areas of the Location. Inspection required Operator to comply with Rule 1004.e.</p> <p>It was observed in this inspection that additional management activities appear to have been conducted; however, it was unclear at the time of the inspection if management has been adequate; noxious weeds remain evident.</p> <p>Ongoing noxious weed management required until site receives a passing final inspection; A followup inspection will be conducted to determine if ongoing weed monitoring/management is sufficient. If it is determined that weed monitoring/management has been insufficient, the CA from FIR #696202824 will remain applicable.</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>PA</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 **Fail**

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

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

Weeds present **Fail** 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>Comment copied from Inspection #696202709:</p> <p>On 5/20/2021, Reclamation Specialist discussed Location and the ongoing reclamation compliance issues with Operator. Operator indicated that there are Locations in which the Surface Owner (USFS) did not want the pads reclaimed, however Operator did not believe this Location was one of those sites.</p> <p>An approved 502.b Final Reclamation Surface Owner Variance Request is required to waive select requirements of COGCC 1004 Rules; until a variance request has been submitted and approved, the Location remains subject to COGCC Rules and requirements, and the corrective action and date will remain applicable.</p>	trujilloam	07/26/2021
<p><b>RECLAMATION COMMENTS</b></p> <p>FIR #680600788 dated 6/9/2016, FIRs #696201332 dated 5/26/2020, #696201679 dated 8/31/2020, #696202031 dated 11/19/2020, #696202709 dated 5/21/2021 and #696202824 dated 6/15/2021 observed that the Location does not meet 1004 reclamation requirements; Equipment remains, Location and access road requiring compaction alleviation, contouring and revegetating. 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 decompacted, re-contoured, and seeded to comply with 1004 series rules by October 15, 2016.</p> <p>It was observed in this inspection that the anchor equipment has been removed.</p> <p>It was also observed in this inspection that the Location remains out of compliance with 1004 Rules and corrective actions; Gravel remains on Location and access road; Location and access road has not been contoured, compaction alleviation not conducted and site/road revegetated. Noxious weeds observed on southern areas of the Location. Corrective actions from inspections have not been addressed; original corrective action and date remains applicable.</p>	trujilloam	07/26/2021

**Attached Documents**

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

Document Num	Description	URL
696202957	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5489323">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5489323</a>