

**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:

06/07/2022

Submitted Date:

06/08/2022

Document Number:

696203739

**FIELD INSPECTION FORM**Loc ID 334074 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 34720

Name of Operator: GORDON ENGINEERING INC

Address: PO BOX 3525

City: GRAND JUNCTION State: CO Zip: 81502

**Status Summary:**

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

**Findings:**

4 Number of Comments

2 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
		travis.gordon.usmc@gmail.com	
		johnngordon1gordon@yahoo.com	
		dnr_cogccenforcement@state.co.us	
		Scott.Schultz@coag.gov	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221806	WELL	PA	02/01/2017	GW	077-08408	FEDERAL 32-1	PA
334074	LOCATION	CL			-	FEDERAL-69S97W 32SWNW	RI

**General Comment:**

On 6/7/2022 Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Gordon Engineering Incs Federal 32-1 Location in Mesa County, Colorado.

This inspection is a follow-up inspection to #696201939, #696202203 and #696203691 to document compliance for the following corrective actions:

-1004: Final Reclamation

-906: Management of Non-E&P waste

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

Refer to the "Environmental" 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.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Inspected Facilities									
Facility ID:	221806	Type:	WELL	API Number:	077-08408	Status:	PA	Insp. Status:	PA
Facility ID:	334074	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
	Other	Inadequate		
Comment	<p>Previous inspection observed that Operator buried concrete blocks on the southern areas of the Location; this is improper disposal of non-E&amp;P solid waste. Inspection required Operator to comply with Rule 906 by 5/31/2022.</p> <p>It was observed in this inspection that the non-E&amp;P waste remains improperly buried on the Location; subsidence issues apparent around areas of the improperly buried material. This corrective action has not been addressed and remains applicable.</p>			
Corrective Action	Comply with Rule 906; remove and properly dispose non-E&P waste buried on Location.			Date: 05/31/2022

**Spill/Remediation:**

Comment:		
Corrective Action:		Date: _____

Emission Control Burner (ECB): \_\_\_\_\_

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

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**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 \_\_\_\_\_

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 **Fail** No disturbance /Location never built \_\_\_\_\_

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

Gravel removed \_\_\_\_\_

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 reclamation.](#)

Corrective Action: **Complete final reclamation activities pursuant to 1004 Rules including, but not limited to, compaction alleviation, contouring/regrading, replacement of soils and revegetation activities on the Location and access road.** Date **11/30/2020**

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

Comment	User	Date
<p><b>RECLAMATION COMMENTS</b></p> <p>Previous inspections documented that final reclamation activities have not been completed; including, but not limited to, compaction alleviation (cross ripping to a minimum depth of 18 inches), contouring/regrading, and revegetation activities on the Location and access road. Inspection required Operator to comply with 1004 rules by 11/30/2020.</p> <p>It was observed in this inspection that final reclamation activities have not been completed in accordance with COGCC 1004 Rules and corrective actions; the section of access road that turns towards the Location has not been decompacted, recontoured/regraded and reclaimed. Operator appears to have attempted revegetation activities on the Location; however, unable to find evidence that required compaction alleviation activities was performed on the Location; areas of cut slope remain evident and appears to have been previously used as a "borrow area" for soils. Cheatgrass has established throughout the entire Location. Subsidence issues also apparent around areas of improperly buried non-E&amp;P waste material</p> <p>Reclamation pursuant to 1004.a minimum requirements has not been conducted; original CA and date remains applicable.</p>	trujilloam	06/08/2022

**Attached Documents**

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

Document Num	Description	URL
403071636	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5773776">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5773776</a>
696203740	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5773774">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5773774</a>