

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

04/17/2023

Submitted Date:

04/18/2023

Document Number:

696204841

## FIELD INSPECTION FORM

 Loc ID 312560 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num: \_\_\_\_\_
**Status Summary:**

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

**Operator Information:**
 OGCC Operator Number: 34720  
 Name of Operator: GORDON ENGINEERING INC  
 Address: PO BOX 113  
 City: SPRINGDALE State: UT Zip: 84767
**Findings:**

- 7 Number of Comments  
3 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
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Fischer, Alex		alex.fischer@state.co.us	
		Scott.Schultz@coag.gov	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221906	WELL	PA	02/01/2017	GW	077-08508	FEDERAL 32-2	RI
312560	LOCATION	CL			-	FEDERAL-69S97W 32NWSE	RI

**General Comment:**

On 4/17/2023, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Gordon Engineering Incs Federal 32-2 Location in Mesa County, Colorado.

This inspection is a follow-up inspection to #696201937, #696202201, #696203457, #696203689, #696203737 and #696204240 to document compliance for the following corrective actions:

- Stormwater
- Cleanup of spills
- Final Reclamation

This inspection is also a followup in response to NOAV #403143402.

It was observed that the Location remains out of compliance with COGCC Rules, inspection corrective actions, as well as abatement and corrective action requirements per the NOAV.

Refer to the "Environmental", "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.

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: 221906 Type: WELL API Number: 077-08508 Status: PA Insp. Status: RI

Facility ID: 312560 Type: LOCATION API Number: - Status: CL Insp. Status: RI

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_

Estimated Spill Volume: \_\_\_\_\_

Comment: Inspection #696201937 dated 10/23/2020 observed what appeared to be cement waste material had been spilled onto approximately 0.11 acres of the surface north of the Location. Inspection required Operator to clean or remove impacted soils, and that disturbed areas will require reclamation. Subsequent inspections documented that work to address the spill was not conducted, resulting in NOAV #403143402 being issued, and requiring a Form 27 to identify the waste material that was discharged, to clean or remove impacted soils to Table 915-1 cleanup concentrations, and to submit documentation of clean-up (including waste manifests to document proper disposal) by 08/25/2022. Unable to find evidence that Operator cleaned or removed impacted soils; it was observed in this inspection that the spill area has not been cleaned and reclaimed; waste material remains evident; unable to find records of a Form 27 submission identifying waste materials. This Location remains out of compliance with NOAV abatement requirements, and corrective actions; original CA and date from prior inspections, and NOAV #403143402 remain applicable.

Corrective Action: **Clean or Remove impacted soils to Table 915-1 Cleanup Concentrations; comply with Rules 906.a through 906.d. Comply with NOAV #403143402 Abatement / Corrective Action requirements.**

Date: 11/30/2020

Reportable: \_\_\_\_\_

GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_

Depth to Ground Water: \_\_\_\_\_

**Water Well Complaint:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_

Owner Name: \_\_\_\_\_

GPS : \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_

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

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

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

Compaction alleviation Pass Dust and erosion control **Fail**

Non cropland: Revegetated 80% **Fail** 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 **11/30/2020**

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. Contact surface owner for seed mixture used during reclamation. Ensure BMPs are implemented per good engineering practices to stabilize the seeded soils, and to protect the reclamation areas. Comply with NOAV #403143402 Abatement or Corrective Action requirements.

Overall Final Reclamation  Well Release on Active Location  Multi-Well Location

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See "COGCC Comments" at the end of this report for Stormwater Comment](#)

Corrective Action: **Install or repair required BMPs in accordance with Rule 1002.f. Ongoing stormwater monitoring/management is required until site receives a passing final reclamation inspection.**

Date: 03/02/2022

Pits:  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
<p><b>STORMWATER COMMENT</b></p> <p>Inspection #696203457 dated 3/2/2022 observed that stormwater and erosion control BMPs were missing or insufficient along the access road. Inspection required Operator to comply with Rule 1002.f.</p> <p>Subsequent inspections observed BMPs remained missing from the road, as well as from the Location; erosion degradation and sediment transport evident.</p> <p>NOAV #403143402 was issued 8/22/2022 requiring Operator to comply with Rule 1002.f and implement stormwater and erosion control BMPs, to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation at the Location and access road by 9/21/2022.</p> <p>It was observed in this inspection that the Location remains out of compliance with Rule 1002.f; additional reclamation apparent along access road and Location, however BMPs to stabilize the soils, manage runoff/runoff, as well as to minimize erosion, degradation and sediment transport remain missing or insufficient:</p> <p>-Operator has re "pot-holed" the access road; soil piles resulting from this operation have been left loose and unstabilized, and is considered a pollutant source; sediment transport and erosion from the soil piles evident. Stormwater runoff from the access road resulting in sediment deposition to undisturbed adjacent areas has persisted.</p> <p>-Stormwater and erosion control BMPs remain inadequate at the Location: soils over the reclaim areas have been left exposed, unstabilized, and at risk to wind and water erosion. BMPs to manage runoff and to minimize off-site sediment transport along the perimeter of the unstabilized reclaim areas also remain missing or insufficient.</p> <p>This Location remains out of compliance with NOAV abatement requirements, and corrective actions; corrective actions and date from prior inspections, and NOAV #403143402 remain applicable.</p>	trujilloam	04/18/2023

<p><b>RECLAMATION COMMENT</b></p> <p>Inspection #696201937 dated 10/23/2020 observed that the Location was not reclaimed in accordance with 1004 Rules. Inspection required Operator to comply with 1004 Rules by 11/30/2020.</p> <p>Subsequent inspections documented that Final Reclamation work was not conducted, resulting in NOAV #403143402 being issued and required Operator to conduct final reclamation in accordance with Rule 1004.a on the Location, access road, and impacted areas (refer to "Environmental" section regarding spill) by 9/21/2022.</p> <p>-It was observed in this inspection that the Location has been decompacted, and recontoured. However, seeding activities are not apparent on the Location and the access road; unable to find evidence that seeding activities have been completed; Reclamation Specialist was unable to observe seed within soil surface/subsurface, or desirable perennial vegetative germination. Additionally, BMPs to stabilize the soils and to protect the reclamation areas remain missing or insufficient (see "Stormwater").</p> <p>-It was also observed that Operator has re "pot-holed" the access road, resulting in large holes and soil piles throughout the former road; soils have been left unstabilized (see "Stormwater"); access road has not been properly contoured and stabilized.</p> <p>-It was also observed that reclamation, as well as any remediation requirements to address the spill area north of the Location has not been conducted.</p> <p>Location remains out of compliance with COGCC Rules, Corrective Actions NOAV #403143402 requirements.</p>	<p>trujilloam</p>	<p>04/18/2023</p>
<p>It is being noted that this same observations and issues regarding the unstabilize soils and contouring requirement along the "pot holed" access road were identified within inspection #696203457 dated 3/2/2022.</p>	<p>trujilloam</p>	<p>04/18/2023</p>

**Attached Documents**

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

Document Num	Description	URL
403377045	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6085707">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6085707</a>
696204842	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6085703">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6085703</a>