

**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:

07/10/2023

Submitted Date:

07/11/2023

Document Number:

696205084

**FIELD INSPECTION FORM**Loc ID 412922 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10515

Name of Operator: GUNNISON ENERGY LLC

Address: 1801 BROADWAY #1150

City: DENVER State: CO Zip: 80202

**Status Summary:**

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

**Findings:**

9 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
,		geops@oxbow.com	Inspection mail box
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
294803	WELL	PR	10/01/2021	GW	051-06079	HOTCHKISS FEDERAL 1289 17-11	RI
412922	LOCATION	AC			-	DGU Federal 1289 17-11 Pad	RI
436561	WELL	AL	11/01/2018	LO	051-06123	DGU Federal 1289 17-11 CS2	RI

**General Comment:**

On 7/10/2023, Reclamation Specialist Trujillo inspected Gunnison Energy LLC's DGU Federal 1289 17-11 pad location in Gunnison County, Colorado.

This inspection is a followup to #696202043, #696203553 and #696204286 to document compliance with the following corrective actions:

- §34-60-121(1)(a), C.R.S.: Form 4 condition requirements
- Signage
- Plugging and abandonment of conductor.
- Protection of stockpiled soils
- Anchors improperly marked

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

The following new compliance issues were observed per this inspection:

- Interim Reclamation

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.

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: ☐**Signs/Marker:**

Type	TANK LABELS/PLACARDS		
Comment:	Posted next to battery sign.		
Corrective Action:		Date:	
Type	OTHER		
Comment:	See "Comment #1" under "COGCC Comments" at the end of this Report.		
Corrective Action:		Date:	
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	BATTERY		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment:

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:	294803	Type:	WELL	API Number:	051-06079	Status:	PR	Insp. Status:	RI
Facility ID:	412922	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	436561	Type:	WELL	API Number:	051-06123	Status:	AL	Insp. Status:	RI

**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 \_\_\_\_\_ Pass \_\_\_\_\_

Comment

Previous inspection observed soil stockpiles on the north end of the Location missing required BMPs. Inspection required Operator to comply with Rule 1002.f and 1002.c.

It was observed in this inspection that the soil stockpiles have been removed. CA no longer applicable.

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? \_\_\_\_\_ Fail \_\_\_\_\_

Comment

Previous inspection observed markers at anchors on the Location have not been maintained in a proper condition. Inspection required Operator to maintain anchors on the Location.

It was observed in this inspection that markers at anchors on the Location have not been maintained in accordance with 1003.a requirements.

This CA has not been addressed and remains applicable.

Corrective Action

Maintain markers.

Date 11/18/2022

1003b. Area no longer in use? Fail Production areas stabilized ? \_\_\_\_\_

1003c. Compacted areas have been cross ripped? Fail

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? Fail

Production areas have been stabilized? \_\_\_\_\_ Segregated soils have been replaced? Fail

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

## 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

Operator received a 502.b Delayed Interim Reclamation variance via Sundry #401463219; pursuant Form 4 and Variance Conditions of Approval, interim reclamation work on the Location is required by 12/9/2022.

It was observed in this inspection that work including, but not limited to, compaction alleviation, recontouring/regrading and reclamation to reduce the Location to areas only needed for production has not been performed in accordance with Rule 1003.b, and Form 4 COAs.

## Corrective Action

Comply with Rule 1003.b. A CA date of 12/9/2022 is being provided as this was the latest date reclamation was required to commence, per Form 4 conditions.

Date 12/21/2022

Overall Interim Reclamation Fail

**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: Previous inspections observed that the conductor for the abandoned well API #05-051-06123 has not been plugged and reclaimed per Rule 406 Requirements. Inspections required Operator to comply with Rule 406.e.(4).

Inspection #696204286 observed that though the conductor has been removed, no Form 4 "Report of Work Done, Other: Plugged Conductor for the Oil and Gas Location" to report the plugging of the conductor has been submitted. Inspections required Operator to comply with Rule 406.e.(4).

Unable to find record that Operator has submitted a Form 4 "Report of Work Done, Other: Plugged Conductor for the Oil and Gas Location" to report the plugging of the conductor associated with Well API 05-051-06123. CA remains applicable.

Corrective Action: **Comply with Rule 406.e.(4)**

Date **05/31/2022**

Overall Final Reclamation

Well Release on Active Location ☐

Multi-Well Location ☐

**COGCC Comments**

Comment	User	Date
<p><b>COMMENT #1</b></p> <p>Pursuant to conditions within the 502.b Delayed Interim Reclamation NTO document #401463219, Operator was required to post a sign at the location entrance stating the following: "A COGCC variance has been approved to delay the commencement of interim reclamation to no later than December 9, 2022".</p> <p>Previous inspections observed that signage per Form 4 Conditions was not installed or maintained. Inspections required Operator to comply with Form 4 COAs and install/maintain sign.</p> <p>It was observed in this inspection that sign has been removed from the Location entrance.</p> <p>Form 4 #01463219 expired 12/9/2022 and therefore sign is no longer required and corrective action is no longer applicable, though it is noted that Operator failed to comply with §34-60-121(1)(a), C.R.S.: Form 4 condition requirements.</p>	trujilloam	07/11/2023

**Attached Documents**

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

Document Num	Description	URL
696205085	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6177349">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6177349</a>