

**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:

07/17/2024

Submitted Date:

07/31/2024

Document Number:

697505395

FIELD INSPECTION FORM

Loc ID 479191 Inspector Name: Binschus, Chris 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:

ECMC Operator Number: 10243
Name of Operator: GMT EXPLORATION COMPANY LLC
Address: 4949 S NIAGARA ST SUITE 250
City: DENVER State: CO Zip: 80237

Findings:

- 6 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
		shannon.kime@state.co.us	
		Mblair@gmtexploration.com	
		julie.schuyler@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479191	LOCATION	AC			-	Crystal-Ruby Pad	RI

General Comment:

This is a joint inspection with CDPHE Water Quality Control Division. CDPHE was conducting a construction stormwater inspection of GMT Exploration Company LLC locations and ECMC staff attended. ECMC will not issue any corrective actions that would also be a corrective action for CDPHE.

The below are potential observations being addressed by CDPHE.

1. Areas of seed and mulch had bare spots and/or riling
2. Rills were observed on banks of retention pond
3. Staining was observed on the ground

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

WEEDS

Comment: [In response to Field Inspection Report \(FIR\) Doc.#709400807 submitted on 2/27/2024, that FIR had a corrective action to control and manage weeds to prevent weed waste and prevent the spread of seeds onto adjacent lands. Operator indicated in FIRR Doc.#403703712 that weeds would be mowed and sprayed in the Spring.](#)

[The current weed management efforts are not sufficient as weedy, annual vegetation was observed throughout the perimeter of location. Weeds were ~4 feet tall in areas.](#)

Corrective Action: [Comply with Rule 606.](#)

Date: 08/14/2024

Overall Good:

Spills:

Type

Area

Volume

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:

corrective date

Type:

#

Comment: [Wildlife protection devices \(netting\) were present for secondary containment BMPs; however, netting needs to be better secured to ensure protection. At the time of this inspection, netting was temporarily secured.](#)

Corrective Action:

Date:

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 479191 Type: LOCATION API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

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 SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment In response to Field Inspection Report (FIR) Doc.#709400807 submitted on 2/27/2024, that FIR had a corrective action to comply with Rule 1002. Operator may have performed work but additional work is required. Both topsoil stockpiles had mostly weedy, annual vegetation establishment.

Corrective Action Best management practices to prevent weed establishment shall be implemented per Rule 1002.c. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted. If reseeding is an option, it is ECMC's expectation that the topsoil stockpiles will be reseeded with an approved CPW seed mix.

Date **10/15/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment Per Rule 1002.e.(1), Operator has adequately constructed and stabilized the entire well pad area to control dust and minimize erosion; however, cut slopes need additional stabilization and maintenance.

CDPHE also noted this issue during their inspection. ECMC will allow the Operator to complete the corrective action through the CDPHE process.

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 ? Pass

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

Production started on 09/2022; therefore, interim reclamation would be required by 03/2023. Operator submitted a Rule 502.b. variance for relief from interim reclamation timing requirements on 5/22/2023. ECMC staff is currently reviewing the variance request.

Reclamation construction areas are in process of vegetation establishment; however, there appears to be a lack of desirable vegetation and weedy, annual vegetation has overtaken.

Location is within Mule Deer Severe Winter Range.

ECMC staff has concerns about the current introduced seed mix being used as it relates to High Priority Habitat. It is ECMC's expectation that reclamation areas will be reseeded with an approved CPW seed mix.

Corrective Action

Consult with CPW to determine a proper seed mix. Provide documentation of the consultation and the recommended CPW seed mix. ECMC will instruct Operator on the next step after receiving the recommended CPW seed mix.

Date 09/16/2024

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:

Corrective Action:

Date _____

Overall Final Reclamation

Well Release on Active Location

Multi-Well Location

Attached Documents

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

Document Num	Description	URL
697505396	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647127