

**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:

697505397**FIELD INSPECTION FORM**Loc ID 479197 Inspector Name: Binschus, Chris On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10243Name of Operator: GMT EXPLORATION COMPANY LLCAddress: 4949 S NIAGARA ST SUITE 250City: DENVER State: CO Zip: 80237**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**7 Number of Comments2 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
		Mblair@gmtexploration.com	
		shannon.kime@state.co.us	
		julie.schuyler@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
479197	LOCATION	AC			-	Marble-Redstone 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. Riprap check dams had sediment accumulated greater than ½ the height of the crest and had displaced rocks
2. Filtrexx sediment control log used as check dams had holes in the fabric, had broken stakes, were flattened, and had sediment accumulated greater than ½ the height of the control measure
3. Areas of seed and mulch had bare spots and/or riling; straw mulch was no longer crimped in the ground
4. Culvert inlet had debris and sediment accumulated and had signs of scouring at downgradient outlet
5. Oil staining was observed on the ground
6. Concrete bags were ripped open and exposed to stormwater
7. Rills were observed on banks and inflow points of retention pond

**Location**Overall Good: ☐

Emergency Contact Number:

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

Type	TRASH		
Comment:	In response to Field Inspection Report (FIR) Doc.#709400809 submitted on 2/27/2024, that FIR had a corrective action to remove trash. Operator indicated in FIRR Doc.# 403704110 that trash had been cleaned up. At the time of this inspection, Operator has completed the corrective action.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	In response to Field Inspection Report (FIR) Doc.#709400809 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.#403704110 that weeds would be mowed and sprayed in the Spring. At the time of this inspection, Operator appeared to have sufficient weed management but desirable vegetation was lacking in areas.		
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:	479197	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 \_\_\_\_\_

Both topsoil stockpiles have been straw crimped with mulch and seeded; however, the northern topsoil stockpile 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.

Date **10/15/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Pass \_\_\_\_\_

Comment \_\_\_\_\_

Per Rule 1002.e.(1), Operator has adequately constructed and stabilized the entire well pad area, including cut and fill slopes, to control dust and minimize erosion.

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 The last well to go on 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 6/12/2023. 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 along the southern perimeter of location. It is mostly weedy, annual vegetation.

Location is not within any High Priority Habitat.

Corrective Action Perform additional reclamation in the above described area. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards, including stormwater and weed management.

Date **10/15/2024**

## Overall Interim Reclamation

**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 ☐**Storm Water:**

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

Comment: [In response to Field Inspection Report \(FIR\) Doc.#709400809 submitted on 2/27/2024, that FIR had a corrective action to comply with Rule 1002.f. to repair stormwater erosion on a fill slope. It does not appear the Operator completed this corrective action. ECMC could issue a corrective action for failing to address the previous FIR that remains out of compliance.](#)

[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: \_\_\_\_\_

Pits: ☐ NO SURFACE INDICATION OF PIT**Attached Documents**You can go to ECMC Images (<https://ecmc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
697505398	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647128">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647128</a>