

**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: \_\_\_\_\_**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:**6 Number of Comments3 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
		julie.schuyler@state.co.us	
		Mblair@gmtexploration.com	
		shannon.kime@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		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
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 09/16/2024Overall 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:	<div></div>
Corrective Action:	<div></div>
Overall Final Reclamation	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

Attached Documents

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

Document Num	Description	URL
403873158	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647130">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647130</a>
697505396	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647127">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647127</a>