

**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

LocationOverall 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		
------	------	--------	--	--

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 REVEGETATIONCropland

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

Inspector Name: Binschus, Chris

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
403873159	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647131
697505398	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6647128