

**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:

10/31/2024

Submitted Date:

11/01/2024

Document Number:

696206402**FIELD INSPECTION FORM**Loc ID 324485 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC Operator Number: 10515Name of Operator: GUNNISON ENERGY LLCAddress: 999 18TH STREET SUITE 1755NCity: 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 Comments4 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

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
283917	WELL	SI	09/01/2022	GW	051-06075	HOTCHKISS FEDERAL 12-89 18-43	RI
324485	LOCATION	AC			-	DGU Federal 1289 18-43 Pad	RI
436617	WELL	PR	02/01/2022	CBM	051-06126	DGU Federal 1289 18-43 CS2	RI

General Comment:

On 10/31/2024, Western Reclamation Work Lead Trujillo inspected Gunnison Energy's DGU Federal 1289 18-43 Pad location in Gunnison County, Colorado.

This inspection is a followup to #696203551, #696204284, #696205082, and #696205822 to document compliance with the following corrective actions:

-Interim Reclamation
-Stormwater

This inspection is also a follow-up to NOAV #403347260.

It was observed that this Location remains out of compliance with ECMC Rules, as well as NOAV and Inspection corrective actions.

The following new compliance issues were observed during this inspection

-1004 Final Reclamation Requirements
-1002.c Stockpile Protections

Refer to the "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 inspection that have not been addressed are still applicable

Location				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:				Date: _____
Corrective Action:				
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				
Fencing/:				
Type				
Comment:	Multiple excavations observed throughout the Location related to facility closure operations- excavations have not been fenced pursuant to Rule 913.b.(5)B.i.			
Corrective Action:	Comply with Rule 913.b.(5)B.i Operator on site was provided notice of fencing requirements at excavations.			Date: 11/02/2024
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date:
Flaring:				
Type				
Comment:				
Corrective Action:				Date:

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 _____

Multiple stockpiles associated with excavations observed throughout the Location. BMPs to protect the stockpiles from wind and water erosion, as well as to minimize sediment transport, have not been implemented.

Corrective Action _____

Comply with Rules 1002.c and 1002.f- install or repair required stormwater and erosion control BMPs at the stockpiled soils stored on Location.

Operator on site was provided notice of the stockpile protection requirements.

Date **11/02/2024**

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? _____

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 [See "COGCC Comments" at the end of this report.](#)

Corrective Action _____ Date _____

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:

Pursuant to Rule 1004.a, upon the plugging and abandonment of a well, all debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well.

It was observed in this inspection that pipe/riser equipment on the southeast end of the Location has not been removed. Additionally, various pipe/sucker rods/etc... observed stored throughout the Location.

Well 051-06075 was PAd 7/9/2024 (Form 6(s) 403899880); Well 051-06126 was PAd 7/3/2024 (Form 6(s) 403899884)- all equipment was required to be removed by 10/9/2024.

Corrective Action: **Comply with Rule 1004.a and removal all surface equipment from the Location.**

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: Previous inspections observed that stormwater and erosion control measures to minimize erosion and degradation are missing or insufficient on the Location; BMPs missing or insufficient at the soil stockpile slopes on the northwest end of the Location. Inspection required Operator to comply with 1002.f.

No resolution has been submitted stating work to address the CA was performed; BMPs at the soil stockpile remain missing or insufficient; soils/slope bare, loose and at risk to wind and water erosion.

Corrective Action: **Comply with Rule 1002.f and 1002.c**

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	284075	1433361	
	284075	1433361	

ECMC Comments

Comment	User	Date
INTERIM RECLAMATION COMMENT Previous inspections observed areas of the Location not needed for production, and required Operator to comply with 1003 rules and to conduct interim reclamation by 5/31/2022. Operator filed Docket No. 230500138 on 5/1/2023 requesting a 502.b variance to waive requirements of Rule 1003.b regarding interim reclamation of areas not reasonably necessary for production operations. It was observed in this inspection that the Location remains unchanged; interim reclamation of areas not needed for production have not been completed in accordance with 1003 rules and corrective actions. The status of interim reclamation and 1003 requirements of the Location is pending Commission decision. However, it is noted that that Operator has plugged the two wells on the Location; Location is now subject to 1004 Final Reclamation requirements.	trujilloam	11/01/2024
Facility Closure in process- see Remediation Proj. #36204 for additional details.	trujilloam	11/01/2024

Attached Documents

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

Document Num	Description	URL
696206403	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6770342