

**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:

06/15/2021

Submitted Date:

06/16/2021

Document Number:

696202820

FIELD INSPECTION FORMLoc ID 453805 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10515

Name of Operator: GUNNISON ENERGY LLC

Address: 1801 BROADWAY #1150

City: DENVER State: CO Zip: 80202

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

11 Number of Comments

6 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
		tyson.johnston@oxbow.com	
		heather.lang@oxbow.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
453805	LOCATION	AC			-	Trail Gulch Unit 1090 30	CI

General Comment:

On 6/15/2021, Reclamation Specialist Trujillo conducted a pre-drill storm water and construction inspection at Gunnison Energy's Trail Gulch 1090 30 location in Gunnison County, Colorado.

This inspection is a followup to #696202704 dated 5/21/2021 to document compliance with the following corrective actions
Comply with Rule 1002.f by 5/24/2021

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions. Operator was onsite at time of inspection, and was notified of the compliance issues.

Refer to the "Location Construction" section 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 inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location

Lease Road:			
Type	Access		
comment:	Fugitive dust issues observed on access road(s) and Location. See "Stormwater".		
Corrective Action	L	Date:	

Overall Good: ☐

Emergency Contact Number:

Comment: 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:

Location ConstructionLocation ID: CDP: Comment: Corrective Action: Date: **Form 2A COAs:****Comment:** Corrective Action: Date: **Wildlife BMPs:****Comment:** Corrective Action: Date: **Stormwater:**

Erosion BMPs	Present	Other BMPs	Present
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Comments:	Erosion BMPs:	Straw wattles observed along the access road entrance, and the southeast corner of the Location have not been installed in accordance with good engineering practices; BMPs to stabilize fill slopes and to allow for sediment laden-free stormwater discharge also missing or insufficient. See photos 18-21	
	Other BMPs:		
Corrective Action:		Comply with Rule 1002.f and install BMPs to protect/stabilize slopes, and to manage runoff and allow for sediment laden-free stormwater discharge.	Date: 06/18/2021
	No		No
Comments:	Erosion BMPs:	FIR #696202704 observed that stormwater and erosion control BMPs are missing or insufficient at the topsoil stockpile. It was observed in this inspection that straw mulch has been blown onto the soil stockpile, and erosion logs installed along the northern/eastern perimeter of the stockpile. Straw has not been crimped, or used in conjunction with any other stabilization BMP, and is insufficient alone to stabilize and protect the topsoil stockpile. See photos 6-8	
	Other BMPs:	Erosion logs have not been installed in accordance with good engineering practices. BMPs have not been installed along the entire perimeter of the topsoil stockpile to prevent sediment transport/discharge.	
Corrective Action:		This corrective action has not been addressed and remains applicable; Comply with Rule 1002.f and Rule 1002.c.	Date: 05/24/2021
Comments:	Erosion BMPs:		
	Other BMPs:	Culvert observed at the Location entrance has been partially covered with sediment at the inlets/outlets. Ensure BMPs remains in proper functioning condition.	
Corrective Action:			Date:
	No		No
Comments:	Erosion BMPs:	It was observed in this inspection that control measures to protect and stabilize the cut and fill slopes of the Location are missing or insufficient. See photos 10-14, 16.	
	Other BMPs:	It appears Operator implemented tracking along slopes; tracking insufficient and was not applied up and down the slope. Tracking only evident and portions of the slope. BMP has not been installed in accordance with good engineering practices.	
Corrective Action:		Comply with Rule 1002.f and install BMPs to protect and stabilize the cut and fill slopes of the Location.	Date: 06/18/2021
	No		No
Comments:	Erosion BMPs:	Silt fence was the only perimeter stormwater control observed to manage runoff from the Location. There is a gap on the west end of the Location (at former road) where silt fence, or additional stormwater control BMPs are missing. There are also areas on the southwestern perimeter of the Location where BMPs to manage stormwater runoff are missing or insufficient. See photo 15.	
	Other BMPs:		
Corrective Action:		Comply with Rule 1002.f and install BMPs to manage runoff and allow for sediment laden-free stormwater discharge.	Date: 06/20/2021

	No	No`	
Comments: Erosion BMPs:	Fugitive dust issues were observed along the access road, and Location. Operator onsite was notified of the issue, and that mitigation measures are required.		
Other BMPs:			
Corrective Action:	Comply with Rule 1002.f and Form 2A permit conditions; take active measures to prevent fugitive dust emissions from the well pad, well pad access entrance, other connecting dirt roads during re-construction, drilling, completion, and production operations.		Date: 06/15/2021
	No	No`	
Comments: Erosion BMPs:	FIR #696202704 observed that stormwater and erosion control BMPs are missing or insufficient along the newly constructed access road. It was observed that erosion logs were placed along approximately 100-200 feet of the western side of the access road, west of the Location; erosion logs have not been installed in accordance with good engineering practices. See photos 22-28		
Other BMPs:	BMPs to manage runoff remain missing or insufficient along the entire access road. Additionally, BMPs to protect/stabilize the cut/fill sections of access road remain missing or insufficient.		
Corrective Action:	This corrective action has not been addressed and remains applicable; Comply with Rule 1002.f.		Date: 05/24/2021
<u>Comment:</u>	Stormwater control measures to allow for sediment laden-free stormwater discharge are missing or insufficient. It was also observed that the sediment pond identified within the Location Drawing attached to the Form 2A permit has not been constructed.		
<u>Corrective Action:</u>			<u>Date:</u>

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected FacilitiesFacility ID: 453805 Type: LOCATION API Number: - Status: AC Insp. Status: CI**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
402720995	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5457268
696202821	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5457267