

**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:

07/21/2021

Submitted Date:

07/26/2021

Document Number:

696202954

**FIELD INSPECTION FORM**

Loc ID: 324464 Inspector Name: Trujillo, Aaron On-Site Inspection:  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 10515  
Name of Operator: GUNNISON ENERGY LLC  
Address: 1801 BROADWAY #1150  
City: DENVER State: CO Zip: 80202

**Findings:**

- 9 Number of Comments
- 5 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
324464	LOCATION	AC			-	FEDERAL-610S90W 30SWSE	RI

**General Comment:**

On 7/21/2021, Reclamation Specialist Trujillo conducted an interim reclamation and storm water inspection at Gunnison Energy's Federal 30-4 location in Gunnison County, Colorado.

This inspection is a followup to #696202645, #696202706 and #696202822 to document compliance with the following corrective actions  
606: Good Housekeeping (5/22/2021)  
608.e: Mechanical Conditions (5/22/2021)  
912: Spills and Releases (5/22/2021)  
1003.b: Reclamation of areas no longer needed for production (6/7/2021)  
1003.f: Noxious weed management (6/24/2021)

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

Refer to the "Location" and "Reclamation" 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 inspections that have not been addressed are still applicable; due to the nature, extent, or duration of the alleged rule violations, Location is being considered for enforcement.

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

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	WEEDS		
Comment:	<p>Previous inspection observed noxious weeds (Canada thistle, Bindweed, Musck thistle, Hoary cress) on the Location, and required Operator to comply with Rule 1003.f. Previous inspections also observed signs indicating herbicide application was performed, however it was unclear if management has been sufficient to control weeds.</p> <p>It was observed in this inspection that weed monitoring/management has been inadequate; bindweed has continued to establish throughout the west end of the Location, including the tank battery. See photos 15, 16.</p>		
Corrective Action:	Comply with Rule 606 and Rule 1003.f	Date:	07/30/2021
Type	STORAGE OF SUPL		
Comment:	<p>Inspection #696202645, 696202706 and #696202822 observed various trash, debris and unused equipment stored throughout the Location.</p> <p>It was observed in this inspection that the various trash, debris and unused equipment remain on the Location; original corrective action and date remains applicable.</p> <p>In addition, equipment/debris was also observed being stored off-site, west of the Location. See photos 3, 4, 8-12.</p>		
Corrective Action:	Comply with Rule 606	Date:	05/22/2021

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Previous inspections observed leaking equipment on the west end of the Location, resulting in a spill/stained soils. Inspection required Operator to Control and contain spills/releases and clean up.

It was observed in this inspection that equipment leak appears to have been controlled, and impacted soils appear to have been addressed.

Multiple Spills and Releases?

**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:					
Corrective Action:					Date:

**Paint**

Condition	<input type="text"/>
Other (Content)	<input type="text"/>
Other (Capacity)	<input type="text"/>
Other (Type)	<input type="text"/>

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate	
Comment:	<p>Previous inspection observed that the integrity of the containment BMP at the tanks was inadequate. Inspection required Operator to comply with Rule 603.o.</p> <p>It was observed in this inspection that the secondary containment BMPs remain inadequate to contain 150% of the volume of the tank.</p>				
Corrective Action:	<p>Repair or install berms or other secondary containment devices per Rule 603.o. Ensure secondary containment is adequate to contain 150% of the volume of the tank(s).</p>			Date:	06/24/2021

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 324464 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

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 \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

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

Comment [Operator storing equipment/debris off-site, to the west of the Location. See "good housekeeping" and photos 3-4.](#)

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused or unneeded equipment onsite? \_\_\_\_\_ Fail \_\_\_\_\_

Comment [See "good housekeeping".](#)

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? Fail 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? \_\_\_\_\_ F \_\_\_\_\_

Comment

Corrective Action

Date 06/07/2021

Overall Interim Reclamation Fail

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: \_\_\_\_\_

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
				Material Handling And Spill Prevention	Fail	
<p>Comment: A barrel (antifreeze/coolant) and a bucket (containing unknown fluids) observed stored on the Location without required secondary containment. It was also observed that no safety labeling has been applied identifying contents within bucket. See photos 5-7.</p>						Date: 07/29/2021
<p>Corrective Action: Comply with Rule 1002.f.(2)A and implement secondary containment. Comply with 605 Rules and apply labeling information identifying contents.</p>						
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments		
Comment	User	Date
<p><b>INTERIM RECLAMATION COMMENTS</b></p> <p>Previous inspections observed areas on the northwest, and southern end of the Location require reclamation in accordance with Rule 1003.b by 6/7/2021.</p> <p>Inspection #696202645 also observed that a sediment trap/pond was planned for construction on the southern areas of the Location as part of the construction of the Trail Gulch Unit 1090 /30.</p> <p>COGCC notified Operator within previous inspections, and within a phone meeting with the Principal Agent, that the corrective action to conduct interim reclamation will remain applicable for the identified areas, and for unused areas on the south end of the Location not part of the sediment trap, unless BMP is not constructed, at which point all unused, disturbed areas will remain subject to Rule 1003.b.</p> <p>It was observed in this inspection that interim reclamation of areas not needed for production has not been performed in accordance with 1003 rules; equipment stored on the northwestern areas; areas have not been decompacted/recontoured/regraded and revegetation activities not performed.</p> <p>It was also observed that the Sediment trap/pond BMP has been constructed on the west end of the Location.</p> <p>This corrective action has not been addressed and remains applicable.</p>	trujilloam	07/26/2021

**Attached Documents**

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

Document Num	Description	URL
402759182	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5488366">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5488366</a>
696202955	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5488362">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5488362</a>