

**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:

05/10/2022

Submitted Date:

05/12/2022

Document Number:

696203691

FIELD INSPECTION FORMLoc ID 334074 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 34720

Name of Operator: GORDON ENGINEERING INC

Address: PO BOX 3525

City: GRAND JUNCTION State: CO Zip: 81502

Status Summary:

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

Findings:

4 Number of Comments

2 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
		johnngordon1gordon@yahoo.com	
		Scott.Schultz@coag.gov	
		travis.gordon.usmc@gmail.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221806	WELL	PA	02/01/2017	GW	077-08408	FEDERAL 32-1	RI
334074	LOCATION	CL			-	FEDERAL-69S97W 32SWNW	RI

General Comment:

On 5/10/2022 Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Gordon Engineering Incs Federal 32-1 Location in Mesa County, Colorado.

This inspection is a follow-up inspection to #696201939 and #696202203 to document compliance for the following corrective actions:
-1004: Final Reclamation

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

The following new compliance issues were identified per this inspection:
-906: Management of Non-E&P Waste

Refer to the "Environmental" 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.

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

LocationOverall 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:

Inspected Facilities				
Facility ID: <u>221806</u>	Type: <u>WELL</u>	API Number: <u>077-08408</u>	Status: <u>PA</u>	Insp. Status: <u>RI</u>
Facility ID: <u>334074</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>CL</u>	Insp. Status: <u>RI</u>

Environmental**Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
	Other	Inadequate		
Comment	<p>Pursuant to Rule 906.d, Operators will not burn or bury non-E&P Waste on Oil and Gas Locations.</p> <p>It was observed in this inspection that concrete blocks have been buried on southern areas of the Location; this is improper disposal of non-E&P solid waste material.</p>			
Corrective Action	Comply with Rule 906; remove and properly dispose non-E&P waste buried on Location.			Date: 05/31/2022

Spill/Remediation:

Comment:			
Corrective Action:		Date:	

Emission Control Burner (ECB):	
Comment:	
Pilot:	Wildlife Protection Devices (fired vessels):

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

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 _____

Corrective Action _____ Date _____

Overall Interim Reclamation**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 **Fail** No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: [See "COGCC Comments" for comments regarding reclamation.](#)

Corrective Action: **Complete final reclamation activities pursuant to 1004 Rules including, but not limited to, compaction alleviation, contouring/regrading, replacement of soils and revegetation activities on the Location and access road.** Date **11/30/2020**

Overall Final Reclamation	Fail	Well Release on Active Location		Multi-Well Location	
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COGCC Comments

Comment	User	Date
<p>RECLAMATION COMMENTS</p> <p>Previous inspections documented that final reclamation activities have not been commenced including, but not limited to, compaction alleviation (cross ripping to a minimum depth of 18 inches), contouring/regrading, and revegetation activities on the Location and access road. Inspection required Operator to comply with 1004 rules by 11/30/2020.</p> <p>It was observed in this inspection that final reclamation activities have not been completed in accordance with COGCC 1004 Rules and corrective actions; the section of access road that turns towards the Location has not been decompacted, recontoured/regraded and reclaimed. Operator appears to have attempted revegetation activities on the Location; however, unable to find evidence that required compaction alleviation activities was performed on the Location; areas of cut slope remain evident and appears to have been previously used as a "borrow area" for soils.</p> <p>Reclamation pursuant to 1004.a minimum requirements has not been conducted; original CA and date remains applicable.</p>	trujilloam	05/12/2022

Attached Documents

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

Document Num	Description	URL
403048516	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5753117
696203692	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5753107