

Inspection Photos and Issue Report

11/1/2022

Operator: GUNNISON ENERGY LLC - 10515

Location #453805

Gunnison County, CO

Aaron Trujillo

NW Reclamation Specialist

COGCC

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Photo 1: Photos 1-2 taken from the west end of the current production pad area. Photos provide an overview of the Location from north, northeast, southeast to south.

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Photo 2: See comments under photo 1.



Photo 3: Photo taken from the cut slopes of the Location. Photos examples showing Operator implemented “potholing” at cutslopes; BMP observed to be inadequate for the site’s conditions, and per good engineering practices in order to minimize erosion/degradation, and to protect/stabilize the cutslopes; erosion degradation and sediment transport has persisted.



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Photo 4: Photos taken from the fill slopes on the west end of the Location. Photos show Operator appears to have repaired erosion observed on the fill slopes, applied straw mulch that was tracked in place in conjunction with seeding. Slopes appear stabilized at time of inspection, and is considered “in process”. Ensure BMPs are maintained in proper functioning condition.

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Photo 5: Photo taken from the topsoil stockpile on the north end of the Location. Photo shows large areas of the soil stockpile with bare soil at risk to wind and water erosion; control measures to minimize erosion, degradation at the stockpile, and BMPs to manage runoff and minimize sediment transport along the perimeter of the soil stockpile remain missing or insufficient. Yellow line represents top of the cut slope/base of the stockpile.

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Photo 6: Continued from photo 5. Photo example showing areas of the topsoil stockpile that remains bare, and at risk to wind and water erosion; BMPs to minimize erosion, degradation and sediment transport remain missing or insufficient.

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Photo 7: Continued from photo 5. Photo example showing areas of the topsoil stockpile that remains bare, and at risk to wind and water erosion; BMPs to minimize erosion, degradation and sediment transport remain missing or insufficient.

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Photo 8: Photo shows Operator implemented a single row of erosion log (straw wattle) along the eastern, northern and southern perimeter of the topsoil stockpile (perimeter BMPs along the southern perimeter remains missing, see photo 5). Photo shows erosion log is not in proper functioning condition; BMP partially buried by sediment along areas of the stockpile, or flattened.



Photo 9: Photo example showing 1 of 4 stockpiles observed where Operator has conducted excavation operations to collect soil samples (see remediation proj. #23148). BMPs to protect the stockpiled soils, and to minimize erosion and sediment transport from the potentially impacted soil stockpiles are missing or insufficient. Stockpile shown in photo an example where Operator installed a berm at its base- Berms observed are unconsolidated, permeable, and have not been installed per good engineering practices



Photo 10: Photo example showing 1 of 4 stockpiles observed where Operator has conducted excavation operations to collect soil samples (see remediation proj. #23148). Photo example showing 1 of the 2 areas where Operator excavated, and placed potentially impacted soils within the perimeter stormwater diversion ditch along the east end of the working pad. In addition to missing BMPs to prevent sediment transport from the soil stockpiles, BMPs to prevent stormwater runoff from entering, or discharging from the sample pits within the ditch are also missing or insufficient, potentially increasing the risk of stormwater contamination, and contaminated discharge from the Location.

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Photo 11: Photo taken from the methanol tank adjacent to the well. BMPs to prevent wildlife access were observed to be missing at the secondary containment BMP

