

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

07/10/2023

Submitted Date:

07/12/2023

Document Number:

696205094

## 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
- 3 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
Grey, Daniel		daniel.gray@usda.gov	USFS inspections
		wtoews@blm.gov	
		dnr_cogccenforcement@state.co.us	
		geops@oxbow.com	Inspection mail box

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
120678	GAS COMPRESSOR STATION	AC	12/04/2001		-	RAGGED MTN COMPRESSOR STA 120678	RI
211700	WELL	SI	07/01/2021	GW	051-06022	FEDERAL 30-4	RI
324464	LOCATION	AC			-	FEDERAL-610S90W 30SWSE	RI

**General Comment:**

On 7/10/2023, Reclamation Specialist Trujillo inspected Gunnison Energy at Gunnison Energy LLC's Federal 30-4 location in Gunnison County, Colorado.

This inspection is a followup to:

#696202645 dated 5/6/2021;  
#696202706 dated 5/21/2021;  
#696202822 dated 6/15/2021;  
#696202954 dated 7/21/2021;  
#696203025 dated 8/3/2021;  
#696203170 dated 9/4/2021;  
#696203545 dated 4/4/2022;  
and #69620282 to document compliance with the following corrective actions:

-Interim Reclamation  
-NOAV abatement requirements

This inspection is also a followup to NOAV #403040539 issued 5/6/2022.

It was observed that this Location remains out of compliance with CECMC Rules, corrective actions and NOAV abatement requirements.

The following new compliance issued were observed during this inspection:

-Good housekeeping  
-Stormwater

Refer to the "Location", "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 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 CECMC rules.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type

UNUSED EQUIPMENT

Comment:

Various unused pipe, equipment and trash/debris observed improperly stored on the Location.

Corrective Action:

Comply with 606 Rules. The "Date of Discovery" is being provided as the corrective action date. Location will remain out of compliance until corrective action has been resolved.

Date: 07/10/2023

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: 120678 Type: GAS API Number: - Status: AC Insp. Status: RI

Facility ID: 211700 Type: WELL API Number: 051-06022 Status: SI Insp. Status: RI

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 [See "Comment #1" under "COGCC Comments" at the end of this report for comments regarding Surface Disturbance Minimization.](#)

Corrective Action **Comply with NOAV #403040539 Abatement or Corrective Action requirements.**

Date **06/05/2022**

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

Comment See "Comment #2" under "COGCC Comments" at the end of this report, for comments regarding interim reclamation.

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 \_\_\_\_\_ 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
<p>Comment: Culvert at location observed filled with sediment- maintenance required. What appears to be a "sink hole" observed along access road just west of the Location's entrance.</p> <p>Corrective Action: Comply with Rule 1002.f. The "Date of Discovery" is being provided as the corrective action date. The Location will remain out of compliance until corrective action has been resolved.</p>						Date: 07/10/2023
<p>Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

**COGCC Comments**

Comment	User	Date
<p><b>COMMENT #2</b></p> <p>Inspection on 5/6/2021 and observed disturbed areas on the northwest end of the Location that are no longer needed for production and require interim reclamation. Inspection required Operator to comply with Rule 1003.b by 6/7/2021.</p> <p>Five (5) follow-up inspections between 6/15/2021 and 4/4/2022 observed that interim reclamation had not been performed; NOAV #403040539 was issued 5/6/2022 requiring compliance with the corrective action(s). Operator submitted FIRR #403052855 stating corrective action was completed on 5/13/2022. A sixth (6th) follow-up inspection on 11/1/2022 observed corrective action was not addressed.</p> <p>On May 1, 2023, Operator submitted an application to hearings requesting a variance to Rule 1003. Refer to CECMC Docket #230500138. It is noted that the application was submitted after both the dates reclamation was required per Field Inspection Report, and NOAV corrective actions. The overall status of the interim reclamation for the Federal 30-4 Location will be considered "in process" until a Commission Order regarding the variance request has been provided.</p>	trujilloam	07/12/2023
<p><b>COMMENT #1</b></p> <p>Inspection dated 7/21/2021 observed unused equipment, and other supplies not necessary for use improperly stored on off-site areas adjacent to (north of) the Location. Subsequent inspections between 8/3/2021 and 11/24/2021 observed unused equipment/supplies remain improperly stored off-site; inspection on 4/4/2022 observed unused equipment/supplies had been removed.</p> <p>Operator failed to minimize their land disturbances; NOAV #403040539 was issued 5/6/2022 requiring Operator to conduct and submit (attached to a Form 4) a detailed assessment of the disturbed areas attached to NW Reclamation Specialist Trujillo by 6/5/2022.</p> <p>It was observed in this inspection that the disturbed areas where unused equipment/supplies were improperly stored remain apparent, and no Form 4 with the required assessment information per the NOAV has been submitted.</p> <p>NOAV abatement or corrective action requirements have not been addressed.</p>	trujilloam	07/12/2023

**Attached Documents**

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

Document Num	Description	URL
403461776	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6178186">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6178186</a>

696205095	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6178183">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6178183</a>
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