

**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:

05/21/2021

Submitted Date:

05/24/2021

Document Number:

696202704

**FIELD INSPECTION FORM**Loc 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:**

16 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
		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
453806	WELL	XX	01/27/2018		051-06155	Trail Gulch Unit 1090 30-H1	CI
469135	WELL	XX	11/12/2019		051-06156	Trail Gulch Unit 1090 30-H4	CI
469136	WELL	XX	11/12/2019		051-06157	Trail Gulch Unit 1090 30-H6	CI
469137	WELL	XX	11/12/2019		051-06158	Trail Gulch Unit 1090 30-H2	CI
469138	WELL	XX	11/12/2019		051-06159	Trail Gulch Unit 1090 30-H5	CI
469139	WELL	XX	11/12/2019		051-06160	Trail Gulch Unit 1090 30-H3	CI

**General Comment:**

On 5/21/2021, Reclamation Specialist Trujillo conducted a pre-drill stormwater and construction inspection Gunnison Energy's Trail Gulch 1090 30 location in Gunnison County, Colorado.

The following compliance issues were observed during this inspection:  
1002.f: Stormwater

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**Overall Good: ☒

Emergency Contact Number:

Comment: Required signage observed at the Location entrance (southeastern area of the Location).

Corrective Action:

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

**Good Housekeeping:**

Type	WEEDS		
Comment:	Noxious weeds (Musk thistle, Canada thistle) observed along areas of the Location. Due to the disturbance activities from construction, noxious weeds on the location may become an ongoing issue without vigilant monitoring and management; ensure ongoing noxious weed monitoring and management is performed on the Location in accordance with Rule 1003.f		
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 Construction**

Location ID: 453805

CDP: \_\_\_\_\_

Comment: With use of a small Unmanned Aerial System, a disturbance area of 5.9 acres was mapped on 5/21/2021; this appears to be in compliance with the approved Form 2A for the permitted disturbance area.

Corrective Action:

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

**Form 2A COAs:**

Comment:

Corrective Action:

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

**Wildlife BMPs:**

Comment:

Corrective Action:

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

**Stormwater:**

Erosion BMPs

Present

Other BMPs

Present

	No		No`
Comments: Erosion BMPs:	It was observed in this inspection that stormwater and erosion control BMPs are missing or insufficient along the newly constructed access road southeast of the Location		
Other BMPs:			
Corrective Action: <u>Comply with Rule 1002.f.</u>		Date: 05/24/2021	

		Vehicle Tracking	No`
Comments: Erosion BMPs:	Though off-site sediment transport concerns were not observed in this inspection, it was observed that control measures to prevent vehicle sediment tracking were missing. Advise implementing control measures to mitigate/minimize off-site sediment transport prior to tracking issues.		
Other BMPs:			
Corrective Action:		Date:	

	No		No`
Comments: Erosion BMPs:	It was observed in this inspection that stormwater and erosion control BMPs are missing or insufficient at the topsoil stockpile on the North end of the Location.		
Other BMPs:			
Corrective Action: <u>Comply with Rule 1002.f.</u>		Date: 05/24/2021	

SLOPE ROUGHENING	Yes		
Comments: Erosion BMPs:	Surface roughening observed along cut slopes on the west end of the Location.		
Other BMPs:			
Corrective Action:		Date:	

SILT FENCES	Yes		
Comments: Erosion BMPs:	Silt fence observed installed along the toe of the Location on the southern and western perimeter of the Location		
Other BMPs:			
Corrective Action:		Date:	

BERMS			
Comments: Erosion BMPs:	Operator onsite stated that areas on the north/east end of the Location will be filled/raised during future construction. Operator indicated that a ditch/berm will be constructed along the perimeter to manage runoff/runoff.		
	Ensure control measures are implemented prior to areas of the pad being filled.		
Other BMPs:			
Corrective Action:		Date:	

## RETENTION PONDS

Comments: Erosion BMPs:

Location drawings identify a sediment trap/pond planned on the southwestern end of the Location.

Trap not constructed at time of inspection.

Upon construction, ensure control measure is appropriate in size for the site's conditions, and constructed in accordance with good engineering practices, including a protected outlet to allow stormwater discharge.

Other BMPs:

Corrective Action:

Date:

No

No

Comments: Erosion BMPs:

Control measures to manage stormwater runoff not observed during inspection.

Other BMPs:

Corrective Action:

Date:

**Comment:**

Once construction activities for the Location have been completed, ensure that control measures to protect and stabilize the cut and fill slopes of the Location are implemented in accordance with Rule 1002.f.(2)C. Temporary control measures will be required and maintained in proper functioning condition until long-term stabilization has been achieved.

At time of inspection, Operator on site was notified of the corrective actions provided within this inspection report, and stated that control measures would be installed before the end of the weekend (5/23/2021).

**Corrective Action:****Date:****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 Facilities									
Facility ID:	<u>453805</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>453806</u>	Type:	<u>WELL</u>	API Number:	<u>051-06155</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>469135</u>	Type:	<u>WELL</u>	API Number:	<u>051-06156</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>469136</u>	Type:	<u>WELL</u>	API Number:	<u>051-06157</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>469137</u>	Type:	<u>WELL</u>	API Number:	<u>051-06158</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>469138</u>	Type:	<u>WELL</u>	API Number:	<u>051-06159</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>
Facility ID:	<u>469139</u>	Type:	<u>WELL</u>	API Number:	<u>051-06160</u>	Status:	<u>XX</u>	Insp. Status:	<u>CI</u>

**Reclamation - Storm Water - Pit****Interim Reclamation:**

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

Land Use: RANGELAND

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**

1002a. FENCING \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_ In \_\_\_\_\_

Comment

Soil removal and segregation observed in process at time of inspection. With use of a small unmanned aerial system, Reclamation Specialist observed approximately 4,300 cubic yards of topsoil material salvaged and stored on the North end of the Location.

Unclear at time of inspection where remaining topsoil will be stored/protected on the Location; Pursuant with Rule 1002.b.(2), ensure soil horizons are separated and stored, and marked or documented to facilitate subsequent reclamation.

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

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment

See "Stormwater". Soil removal and segregation observed in process at time of inspection, once soil salvage activities have been completed, ensure control measures to protect the stockpiled soils are implemented and maintained in accordance with Rule 1002.c.

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 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

Operator has indicated that only one well is planned to be drilled within the year. If well produces then additional drilling operations will commence within the coming years.

If Operator determines that drilling or subsequent operations will be delayed, an interim reclamation variance for delayed operations is required per the NTO.

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

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

Final Land Use: RANGELAND

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: <input type="text"/>	Date <input type="text"/>	
Overall Final Reclamation <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>

**Attached Documents**

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

Document Num	Description	URL
402698628	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439000">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5439000</a>
696202705	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5438998">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5438998</a>