

State of Colorado
Oil and Gas Conservation Commission

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Document Number:
402777961

Date Received:
08/26/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

5 of 5 CAs from the FIR responded to on this Form

5 CA Completed
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10515

Name of Operator: GUNNISON ENERGY LLC

Address: 1801 BROADWAY #1150

City: DENVER State: CO Zip: 80202

Contact Name and Telephone:

Name: _____

Phone: () _____ Fax: () _____

Email: _____

Additional Operator Contact:

Contact Name	Phone	Email
<u>Heather Lang</u>		<u>heather.lang@oxbow.com</u>
<u>Tyson Johnston</u>	<u>303-296-8807</u>	<u>tyson.johnston@oxbow.com</u>
<u>Jessica Donahue</u>		<u>jdonahue@ardorenvironmental.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 696203025

Inspection Date: 08/03/2021

FIR Submit Date: 08/11/2021

FIR Status: _____

Inspected Operator Information:

Company Name: GUNNISON ENERGY LLC

Company Number: 10515

Address: 1801 BROADWAY #1150

City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 324464

Location Name: FEDERAL-610S90W Number: 30SWSE County: _____

Qtrqtr: SWSE Sec: 30 Twp: 10S Range: 90W Meridian: 6

Latitude: 39.156037 Longitude: -107.477714

FACILITY - API Number: 05-051-00 Facility ID: 324464

Facility Name: FEDERAL-610S90W Number: 30SWSE

Qtrqtr: SWSE Sec: 30 Twp: 10S Range: 90W Meridian: 6

Latitude: 39.156037 Longitude: -107.477714

CORRECTIVE ACTIONS:

1 CA# 154715

Corrective Action: 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).

Date: 06/24/2021

Response: CA COMPLETED

Date of Completion: 08/03/2021

Operator Comment: Factual Review Request - Corrective Action Completed prior to inspection
Rule 603.o states Operators will design, construct, and maintain secondary containment devices around NEW

and SIGNIFICANTLY MODIFIED crude oil, condensate, and produced water storage Tanks. The tanks on the Federal 30-4 were installed prior to the revision or Rule 603.o and are not required to have 150% containment until the tank battery is modified or expanded.

COGCC Decision: **Not Approved**

COGCC Representative: The FIRR, "Corrective Action Complete" section, is not a forum for Operator to disagree/argue with the corrective actions, or to request a factual review.

Control measures to contain a spill determined to not be in proper functioning condition; corrective action to repair or install berms or other secondary containment devices remains applicable.

2 CA# 154716

Corrective Action: Comply with Rule 606 and remove sediment material improperly stored on the Location. Date: 08/18/2021

Response: CA COMPLETED Date of Completion: 08/11/2021

Operator Comment: The existing Federal 30-4 location, Location ID # 324464, was expanded to create the Trail Gulch Unit 1090-30 location, Location ID # 453805. While the location expansion has a separate Location ID number under COGCC, the location was analyzed and approved by the US Forest Service and Bureau of Land Management as one location in the North Fork Mancos Master Development Plan Environmental Analysis. Items identified as being improperly stored on the Federal 30-4 location are part of the aggregated location as defined by the federal NEPA analysis.

Straw waddles and ditch placed around the base of the silt pile to prevent migration until the sediment can be reintegrated during interim reclamation activities.

COGCC Decision: Approved pending re-inspection

COGCC Representative: A follow-up inspection will be conducted at a future date to evaluate compliance with COGCC rules.

3 CA# 154717

Corrective Action: Comply with Rule 606 Date: 05/22/2021

Response: CA COMPLETED Date of Completion: 08/03/2021

Operator Comment: Factual Review Request - Corrective Action Dates are Unattainable

Loose trash and debris has been removed. Inspector has been made aware that certain unused equipment currently on location will be utilized for the production of the Trail Gulch Unit 1090 30-H2 Well. Equipment that will not be used further for either the Trail Gulch Unit 1090-30H2 or the Federal 30-4 will be removed during facility construction for the Trail Gulch Unit 1090 30-H2 well to minimize the nuisance impacts of mobilizing the heavy equipment necessary to set production equipment and remove unnecessary equipment. This activity will take place prior to winter snowfall. Therefore Gunnison Energy respectfully requests a corrective action deadline of 11/1/2021.

COGCC Decision: **Not Approved**

COGCC Representative: The FIRR, "Corrective Action Complete" section, is not a forum for Operator to disagree/argue with the corrective actions, or to request a factual review.

COGCC Decision "Not Approved". Operator comments indicates equipment not needed for production has not been removed from Location; Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

4 CA# 154718

Corrective Action: Comply with 1003 Rules and conduct reclamation on areas of the Location not needed for production. Date: 06/07/2021

Response: CA COMPLETED Date of Completion: 08/03/2021

Operator Comment: Factual Review Request - Corrective Action Dates are Unattainable

Inspector has been made aware that certain unused equipment currently on location will be utilized for the production of the Trail Gulch Unit 1090 30-H2 Well. Equipment that will not be used further for either the Trail Gulch Unit 1090-30H2 or the Federal 30-4 will be removed during facility construction for the Trail Gulch Unit 1090 30-H2 well to minimize the nuisance impacts of mobilizing the heavy equipment necessary to set production equipment and remove unnecessary equipment. This activity will take place prior to winter snowfall. Therefore

Gunnison Energy respectfully requests a corrective action deadline of 11/1/2021.

COGCC Decision: **Not Approved**

COGCC Representative: The FIRR, "Corrective Action Complete" section, is not a forum for Operator to disagree/argue with the corrective actions, or to request a factual review.

COGCC Decision "Not Approved"; Operator was notified in phone conversations (May 2021) regarding interim reclamation requirements of the Location and that corrective action will remain applicable .

5 CA# 154719

Corrective Action: Comply with Rule 1002.f and install required stormwater and erosion control BMPs per good engineering practices.

Date: 07/29/2021

Response: CA COMPLETED

Date of Completion: 08/06/2021

Operator Comment: The storm events that occurred immediately prior to the inspector's arrival were large, extraordinary storm events. Enough rain was encountered to create the erosion event on the location entrance that had not been an issue with previous precipitation events. Erosion was repaired and additional BMPs added along the slope of the entrance road. The stability of the roadway will be closely monitored to ensure additional BMPs are adequate to withstand future storm events.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Stormwater and erosion control BMPs should be able to handle stormwater events and the Location is expected to be in compliance at all times. A follow-up inspection will be conducted at a future date to evaluate compliance with COGCC rules.

OPERATOR COMMENT AND SUBMITTAL

Comment:

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Tyson Johnston

Signed: _____

Title: Vice President

Date: 8/26/2021 11:28:28 AM

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number **Description**

402777961	FIR RESOLUTION SUBMITTED
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Total Attach: 1 Files