

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:

10/11/2022

Submitted Date:

10/12/2022

Document Number:

696204243

FIELD INSPECTION FORM

Loc 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
,		dnr_cogccenforcement@state.co.us	
		travis.gordon.usmc@gmail.com	
		Scott.Schultz@coag.gov	
		johngordon1gordon@yahoo.com	
		denise.arthur@state.co.us	

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 10/11/2022, 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, #696202203, #696203691 and #696203739 to document compliance for the following corrective actions:

- Final Reclamation
- Management of Non-E&P waste

This inspection is also a followup in response to NOAV #403143365.

It was observed that the Location remains out of compliance with COGCC Rules, corrective actions, as well as abatement or corrective action requirements per the NOAV.

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.

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

Environmental**Spill/Remediation:**

Comment:

Inspection #696203691 observed that Operator buried concrete blocks on the southern areas of the Location; this is improper disposal of non-E&P solid waste. Inspection required Operator to comply with Rule 906 by 5/31/2022.

Subsequent inspections observed non-E&P waste remained improperly buried on the Location; NOAV #403143365 was issued 8/22/2022 requiring Operator to remove and properly dispose of all non-E&P waste material buried on the Location. NOAV also required Operator to submit documentation of removal attached to a Form 4, including date stamped photo documentation showing non-E&P waste has been removed, and the waste manifests to document proper disposal.

It was observed in this inspection that Operator appears to have removed the concrete block buried on the southern areas of the Location; Operator also appears to have backfilled areas with sand (see reclamation). It is also noted that Operator has not submitted any documentation of removal attached to a Form 4 per NOAV Requirements.

This Location remains out of compliance with NOAV abatement and corrective action requirements.

Corrective Action:

Comply with NOAV #403143365 Abatement or Corrective Action requirements:

Date: 09/21/2022

Operator shall remove and properly dispose of all non-E&P waste material buried on the Location. Operator shall submit documentation of removal, including date stamped photo documentation showing non-E&P waste has been removed, and the waste manifests to document proper disposal. Attach documentation and submit via Form 4 to Northwest Reclamation Specialist Trujillo.

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 _____ No disturbance /Location never built _____

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

Gravel removed **Fail**

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 Final Reclamation.](#)

Corrective Action: _____ Date **11/30/2020**

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.

Comply with NOAV #403143365 Abatement or Corrective Action requirements.

Overall Final Reclamation

Fail

Well Release on Active Location ☐Multi-Well Location ☐**COGCC Comments**

Comment	User	Date
RECLAMATION COMMENT Inspection #696201939 dated 10/23/2020 observed that Location and access road has not been reclaimed in accordance with 1004 requirements. Inspection required Operator to comply with 1004 rules by 11/30/2020. Subsequent inspections observed that Location was not reclaimed per reclamation rules and corrective actions; NOAV #403143365 was issued 8/22/2022 requiring Operator to conduct final reclamation activities in accordance with Rule 1004.a on the Location and access road. It was observed in this inspection that final reclamation activities have not been completed in accordance with 1004 rules at Location and access road; Location and access road requiring compaction alleviation (cross ripping to a minimum depth of 18 inches), contouring/regrading, replacement of soils and revegetation activities. Operator appears to have removed cement blocks buried on Location, but also appears to have backfilled with sand post excavation activities; operator has not backfilled with soils containing comparative quality, composition and agronomic properties reflective of the adjacent reference soils. This Location remains out of compliance with NOAV abatement requirements, and corrective actions; original CA and date from prior inspections, and NOAV #403143365 remain applicable.	trujilloam	10/12/2022

Attached Documents

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

Document Num	Description	URL
696204244	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884520