

**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:

10/11/2022

Submitted Date:

10/12/2022

Document Number:

696204240

FIELD INSPECTION FORMLoc ID 312560 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:

6 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
Arthur, Denise		denise.arthur@state.co.us	
		travis.gordon.usmc@gmail.com	
		johngordon1gordon@yahoo.com	
		dnr_cogccenforcement@state.co.us	
		Scott.Schultz@coag.gov	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221906	WELL	PA	02/01/2017	GW	077-08508	FEDERAL 32-2	RI
312560	LOCATION	CL			-	FEDERAL-69S97W 32NWSE	RI

General Comment:

On 10/11/2022, Reclamation Specialist Trujillo conducted a final reclamation and stormwater inspection at Gordon Engineering Incs Federal 32-2 Location in Mesa County, Colorado.

This inspection is a follow-up inspection to #696201937, #696202201, #696203457, #696203689 and #696203737 to document compliance for the following corrective actions:

- Stormwater
- Cleanup of spills
- Final Reclamation

This inspection is also a followup in response to NOAV #403143402.

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

Refer to the "Environmental", "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 COGCC rules.

Inspected Facilities									
Facility ID:	221906	Type:	WELL	API Number:	077-08508	Status:	PA	Insp. Status:	RI
Facility ID:	312560	Type:	LOCATION	API Number:	-	Status:	CL	Insp. Status:	RI

Environmental**Spills/Releases:**

Type of Spill: _____

Estimated Spill Volume: _____

Comment: Inspection #696201937 dated 10/23/2020 observed what appeared to be cement waste material been spilled onto approximately 0.11 acres of the surface north of the Location. Inspection required Operator to clean or remove impacted soils, and that disturbed areas will require reclamation. Subsequent inspections documented that work to address the spill was not conducted, resulting in NOAV #403143402 being issued, and requiring a Form 27 to identify the waste material that was discharged, to clean or remove impacted soils to Table 915-1 cleanup concentrations, and to submit documentation of clean-up (including waste manifests to document proper disposal) by 08/25/2022. Unable to find evidence that Operator cleaned or removed impacted soils; it was observed in this inspection that the spill area has not been cleaned and reclaimed; waste material remains evident; unable to find records of a Form 27 submission. This Location remains out of compliance with NOAV abatement requirements, and corrective actions; original CA and date from prior inspections, and NOAV #403143402 remain applicable.

Corrective Action: **Clean or Remove impacted soils to Table 915-1 Cleanup Concentrations; comply with Rules 906.a through 906.d. Comply with NOAV #403143402 Abatement or Corrective Action requirements.**

Date: 11/30/2020

Reportable: _____

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____

Owner Name: _____

GPS : _____

Field Parameters:

Sample Location: _____

Comment: _____

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 _____

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 _____ In _____ Contoured _____ In _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured _____ In _____

Compaction alleviation **Fail** Dust and erosion control **Fail**

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" at the end of this report for Final Reclamation Comment](#)

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. Contact surface owner for seed mixture used during reclamation. Ensure BMPs are implemented per good engineering practices to stabilize the seeded soils, and to protect the reclamation areas.

Comply with NOAV #403143402 Abatement or Corrective Action requirements.

Overall Final Reclamation

Fail

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

Comment: See "COGCC Comments" at the end of this report for Stormwater Comment

Corrective Action: Install or repair required BMPs in accordance with Rule 1002.f. Ongoing stormwater monitoring/management is required until site receives a passing final reclamation inspection.

Date: 03/02/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENT</p> <p>Inspection #696203457 dated 3/2/2022 observed that stormwater and erosion control BMPs were missing or insufficient along the access road. Inspection required Operator to comply with Rule 1002.f.</p> <p>Subsequent inspections observed BMPs remained missing from the road, as well as from the Location; erosion degradation and sediment transport evident. NOAV #403143402 was issued 8/22/2022 requiring Operator to comply with Rule 1002.f and implement stormwater and erosion control BMPs, to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation at the Location and access road by 9/21/2022.</p> <p>It was observed in this inspection that the Location remains out of compliance with Rule 1002.f; final reclamation construction activities are currently ongoing at the Location; specifically recontour work of the Location and access road were in process at time of inspection; soils currently loose and at risk to erosion; BMPs to minimize erosion and sediment transport were not implemented prior to dirt-work activities. Additionally, unable to find documentation, including resolutions submitted by the Operator, documenting that prior corrective actions and requirements were addressed and completed.</p> <p>This Location remains out of compliance with NOAV abatement requirements, and corrective actions; corrective actions and date from prior inspections, and NOAV #403143402 remain applicable.</p>	trujilloam	10/12/2022

RECLAMATION COMMENT

trujilloam

10/12/2022

Inspection #696201937 dated 10/23/2020 observed that the Location was not reclaimed in accordance with 1004 Rules. Inspection required Operator to comply with 1004 Rules by 11/30/2020.

Subsequent inspections documented that Final Reclamation work was not conducted, resulting in NOAV #403143402 being issued and required Operator to conduct final reclamation in accordance with Rule 1004.a on the Location, access road, and impacted areas (refer to "Environmental" section regarding spill) by 9/21/2022.

It was observed in this inspection that additional reclamation work is in process, but not yet completed; contour work along access road has been completed; recontour work at the Location is in process; unable to find evidence that compaction alleviation (cross ripping to a minimum depth of 18 inches) has been completed both beneath areas soils are being replaced, and the eastern half of the Location soils have not been placed; reclamation work to address the spill area north of the Location has not been completed; reseeding activities not yet completed- it has come to Staff's attention that the surface ownership has transferred to a new landowner within the past year; pursuant to 1004.a seed mixtures shall be provided by the surface owner, or provided by the local soil conservation district. A followup will be conducted to determine compliance with 1004 requirements.

Though work is "in process", this Location will remain out of compliance with NOAV abatement requirements, and corrective actions until reclamation work is completed; original CA and date from prior inspections, and NOAV #403143402 remain applicable.

Attached Documents

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

Document Num	Description	URL
403195461	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884533
696204241	Inspection Photos and Issue Report	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884519