

**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:

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	
		denise.arthur@state.co.us	
		johngordon1gordon@yahoo.com	
		Scott.Schultz@coag.gov	

**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 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 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 \_\_\_\_\_

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
<p><b>RECLAMATION COMMENT</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	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
403195464	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884539">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884539</a>
696204244	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884520">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5884520</a>