

**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:

10/30/2022

Submitted Date:

11/03/2022

Document Number:

696204284

FIELD INSPECTION FORMLoc ID 324485 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:

10 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
		Heather.Lang@oxbow.com	
		dave.kubeczko@state.co.us	
		Tyson.Johnston@oxbow.com	
		john.noto@state.co.us	
		fenton.buchanan@state.co.us	
		geops@oxbow.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
283917	WELL	PR	02/01/2022	GW	051-06075	HOTCHKISS FEDERAL 12-89 18-43	RI
324485	LOCATION	AC			-	DGU Federal 1289 18-43 Pad	RI
436560	WELL	EP	11/29/2018	LO	051-06122	DGU Federal 1289 18-43 CS3	RI
436617	WELL	PR	02/01/2022	CBM	051-06126	DGU Federal 1289 18-43 CS2	RI

General Comment:

On 11/1/2022, Reclamation Specialist Trujillo, and Reclamation Supervisor Arthur inspected Gunnison Energy LLC's DGU Federal 1289/18-43 Pad location in Gunnison County, Colorado.

This inspection is a followup to #696203551 dated 4/4/2022 to document compliance with the following corrective actions:

- Interim Reclamation
- Stormwater
- Wildlife protection devices
- Secondary containment
- Storage of unused equipment.

It was observed that this Location remains out of compliance with COGCC Rules and corrective actions

Refer to the "Location", "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: Refer to inspection #7011033222 dated 7/1/2022 for CA regarding 605.h labeling requirements.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	<p>Previous inspection observed unused equipment improperly stored along the access road east of the Location entrance. Inspection required Operator to comply with Rule 606.</p> <p>It was observed in this inspection that equipment has been removed. This CA has been addressed.</p>		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type:	# 2		corrective date
Comment:	<p>Previous inspection observed BMPs to prevent wildlife access to the secondary containment BMPs, for the "produced water" barrels at the wells is missing or insufficient. Inspection required operator to implement BMPs to prevent wildlife access.</p> <p>It was observed in this inspection that wire mesh was placed over containment to prevent wildlife access. This CA has been addressed.</p>		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	2	<50 BBLS	OTHER		,	
Comment:	<p>Previous inspection observed barrels connected at wells to collect produced water have fallen over, and are not functioning as intended. Inspection required Operator to maintain barrels</p> <p>Barrels have been maintained. CA has been addressed.</p>					
Corrective Action:					Date:	

Paint

Condition	<input type="text"/>	
Other (Content)	<input type="text"/>	
Other (Capacity)	<input type="text"/>	
Other (Type)	<input type="text"/>	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Comment:			
Corrective Action:		Date:	
<u>Venting:</u>			
Yes/No			
Comment:			
Corrective Action:		Date:	
<u>Flaring:</u>			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: <u>283917</u>	Type: <u>WELL</u>	API Number: <u>051-06075</u>	Status: <u>PR</u>	Insp. Status: <u>RI</u>
Facility ID: <u>324485</u>	Type: <u>LOCATION</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>RI</u>
Facility ID: <u>436560</u>	Type: <u>WELL</u>	API Number: <u>051-06122</u>	Status: <u>EP</u>	Insp. Status: <u>RI</u>
Facility ID: <u>436617</u>	Type: <u>WELL</u>	API Number: <u>051-06126</u>	Status: <u>PR</u>	Insp. Status: <u>RI</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 _____

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? Fail

Comment

Anchors observed on Location missing required marking, or markers have not been maintained.

Corrective Action

Comply with 1003.a

Date 11/18/2022

1003b. Area no longer in use? Fail 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? Fail

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 Fail Recontoured Fail 80% Revegetation Fail

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 See "Reclamation Comment" under "COGCC Comments at the end of this report."

Corrective Action Comply with 1003 rules.

Date 05/31/2022

Overall Interim Reclamation Fail

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: _____

Date _____

Overall Final Reclamation _____

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 "Stormwater Comment" under "COGCC Comments at the end of this report."](#)

Corrective Action: [Comply with 1002.f; implement and maintain Best Management Practices \(BMPs\) in accordance with good engineering practices to minimize erosion, transport of sediment offsite, and site degradation.](#)

Date: 04/21/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	284075	1433361	
	284075	1433361	

COGCC Comments

Comment	User	Date
Form 2 permit for API 05-051-06122 expired 11/29/2018- no records evident showing well is being re-permitted.	trujilloam	11/03/2022
Submit Form 4 to abandon well permit.		
RECLAMATION COMMENT	trujilloam	11/03/2022
Inspection #696203551 observed that interim reclamation in accordance with 1003 Rules has not been performed on the Location; working pad has not been reduced to only areas reasonably needed for production.		
It was also noted that Form 2A #400537258 states the size of disturbance area during construction is 2.79 acres, reduced to 1.21 acres after interim reclamation. The total disturbance area of the Location is approximately 4 acres in size, and the current production area is currently ~2 acres; OGLA/Permitting included on report for notification purposes.		
Inspection required Operator to comply with 1003 rules by 5/31/2022.		
It was observed in this inspection that interim reclamation in accordance with 1003 rules has not been performed; Location remains unchanged.		
Original Corrective Action and date remains applicable.		

STORMWATER COMMENT

trujilloam

11/03/2022

Inspection #696203551 observed that stormwater and erosion control measures to minimize erosion and degradation are missing or insufficient on the Location; BMPs missing or insufficient at the soil stockpile slopes on the northwest end of the Location, and the cut slopes on the east end of the Location; degradation evident. Northern inlet at the sediment trap on the east end of the Location has not been installed per good engineering practices, or maintained in proper functioning condition; stormwater runoff into trap has resulted in gully erosion at inlet. Inspection required Operator to comply with 1002.f.

It was observed in this inspection that stormwater and erosion control measures to minimize erosion and degradation are missing or insufficient on the Location; unable to find evidence that work was conducted per good engineering practices:

- Gully erosion at sediment trap inlet remains evident; sediment trap has not been constructed with a properly engineered inlet; inlet has not been repaired/maintained per good engineering practices.
- Soils at the soil stockpile slopes on the northwest end of the Location remain bare and at risk to wind and water erosion.
- Erosion degradation remains apparent at cut slopes on the east end of the Location.

Corrective action has not been addressed, and remains applicable.

Attached Documents

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

Document Num	Description	URL
696204285	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5905236