

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:

05/20/2024

Submitted Date:

05/23/2024

Document Number:

696205840

FIELD INSPECTION FORM

Loc ID 453805 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:

Operator Information:

ECMC 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:

14 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	
,		geops@oxbow.com	Inspection mail box
Toews, Wesley		wtoews@blm.gov	
Grey, Daniel		daniel.gray@usda.gov	USFS inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
469137	WELL	PR	06/01/2022	OW	051-06158	Trail Gulch Unit 1090 30-H2	RI

General Comment:

On 5/20/2024, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Gunnison Energy LLC's Trail Gulch Unit 1090 30 Location in Gunnison County, Colorado.

Location is Fed Surface (USFS) / Fed Mineral.

This inspection is a follow-up to #696205092 to document compliance with the following corrective actions:

- Good Housekeeping
- Stormwater
- Anchor marking requirements

This inspection is also a followup to NOAV #403040577 issued 5/6/2022.

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 inspection that have not been addressed are still applicable.

Inspected Facilities									
Facility ID:	469137	Type:	WELL	API Number:	051-06158	Status:	PR	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment [See "Comment #1" under COGCC Comments at the end of this report.](#)Corrective Action [Comply with Rules 1002.f. and 1002.c, as well as 1003.f and 606.c regarding weeds.](#)

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 [Unmarked anchor identified in FIR 696205092 has been removed.](#)

Corrective Action _____

Date _____

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? Fail

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 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? F

Comment See "Comment #2" under COGCC Comments at the end of this report.

Refer to 1002.c regarding noxious weed issues.

Corrective Action _____ Date _____

Overall Interim Reclamation

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 <input type="checkbox"/>		Multi-Well Location <input type="checkbox"/>		
Storm Water:						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Comment: <div style="border: 1px solid black; padding: 2px;">See "Comment #3" under COGCC Comments at the end of this report.</div>						
Corrective Action: <div style="border: 1px solid black; padding: 2px;">Comply with Rule 1002.f</div>					Date: _____	
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

ECMC Comments

Comment	User	Date
COMMENT #1- TOPSOIL PROTECTIONS Previous inspections observed that BMPs to protect the topsoil stockpile from wind and water erosion in such a manner as to minimize erosion, degradation, and sediment transport, and to prevent weed establishment were missing or insufficient. Inspections required Operator to comply with Rule 1002.f and 1002.c by 5/21/2021. NOAV #403040577 was issued 5/6/2022 with requirements to comply with Rule 1002.c. Inspection #696205092 observed that work to address the compliance issues at the topsoil stockpile has been performed: BMPs (erosion logs) to minimize sediment transport has been installed along perimeter of stockpile; Straw mulch has been applied to the stockpile, though mulch does not appear to have been applied with a binder or crimped in. BMP is showing signs of disrepair; Straw has sloughed off, or has been blown off areas of the stockpile, resulting in soils being exposed along slopes. Inspection notified Operator that maintenance was advised to ensure soils remain protected to wind and water erosion prior to failure of the control. It was observed in this inspection that Operator has failed to maintain BMPs at the topsoil stockpiles. Mulch previously applied is no longer evident, likely due to improper anchoring per good engineering practices; large areas of the topsoil stockpile are again exposed and unstabilized. Noxious weed establishment has also recurred on the topsoil stockpile; Noxious weed establishment also evident within other areas of disturbance on the Location, including the access road and perimeter ditch. Operator has failed to maintain BMPs to protect the topsoil stockpile from wind and water erosion, and weed establishment.	trujilloam	05/23/2024

<p>COMMENT #2- INTERIM RECLAMATION</p> <p>Previous inspections observed that drilling operations have been completed for well API 05-051-06158:</p> <ul style="list-style-type: none"> - Rig was released from site on 9/7/20210 (#402842689), frac treatment dates 9/8/2021-9/22/2021, with a completion date of 10/6/2021 (#402843634) - Operator has constructed a multi-well location, but has only drilled/completed one well; frac equipment and drilling equipment no longer on site; continuous drilling or subsequent operations not evident. <p>Pursuant to 1003 rules, interim reclamation required by 4/6/2022.</p> <p>Inspections required Operator to Conduct 1003 interim reclamation, or comply with the January 5, 2017 "Notice to Operators: Interim Reclamation Procedures for Delayed Operations" by 4/6/2022.</p> <p>On July 5th, 2022, Operator submitted an application to hearings requesting a variance to Rule 1003.b. Refer to COGCC Docket #220700178.</p> <p>Though it is noted that the application was submitted after both the dates interim reclamation was required, and the corrective action date to comply with the NTO, the corrective action has been addressed.</p> <p>It is also noted that all permits for undrilled wells on the Location expired 11/11/2021; wells will require re-permitting if future operations are to proceed.</p> <p>The overall status of the interim reclamation for the Trail Gulch Unit 1090/30 Location will be considered "in process" until a Commission Order regarding the variance request has been provided.</p>	trujilloam	05/23/2024
<p>COMMENT #3- STORMWATER</p> <p>Previous inspections observed that control measures to minimize erosion/degradation, and to protect/stabilize the cut and fill slopes of the Location are missing or insufficient; Operator implemented "pot-holing" at cutslopes; BMP observed to be inadequate for the site's conditions, and per good engineering practices in order to minimize erosion/degradation, and to protect/stabilize the cut slopes. Inspections required Operator to comply with 1002.f.</p> <p>Inspection #696205092 observed that Operator had implemented hydromulch/seeding in conjunction with the "pot-holing". However, BMP appeared insufficient or not maintained in proper functioning condition at the cut slopes; erosion/degradation has persisted.</p> <p>Operator submitted FIRR #403502191 stating that the CA has been completed.</p> <p>It was observed in this inspection BMPs to stabilize the cut slopes have not been installed, or maintained in proper functioning condition. Large majority of the cut slopes on the Location remain unstabilized, bare and at risk to wind and water erosion.</p> <p>Operator has failed to implement or maintain BMPs to stabilize, as well as to minimize erosion, degradation and sediment transport at the cut slopes of the Location.</p>	trujilloam	05/23/2024
<p>It is noted that there are small areas where vegetation is establishing on the northern corner of the cut slope, however this appears to be from seed within topsoil sediment that has been eroded/transported from the unstabilized stockpile, onto the cut slope during runoff events.</p>	trujilloam	05/23/2024

Attached Documents

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

Document Num	Description	URL
696205841	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6560175

