

**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:

05/06/2025

Submitted Date:

05/08/2025

Document Number:

718100509

**FIELD INSPECTION FORM**Loc ID 324485 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

ECMC Operator Number: 10515

Name of Operator: GUNNISON ENERGY LLC

Address: 999 18TH STREET SUITE 1755N

City: DENVER State: CO Zip: 80202

**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

**Findings:**

7 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
,		geops@oxbow.com	Inspection mail box
Katz, Aaron		aaron.katz@state.co.us	
Maxwell, Logan		logan.maxwell@state.co.us	
Gaasche, Emily		emily.gaasche@state.co.us	
Chamard, Megan		megan.chamard@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
283917	WELL	SI	09/01/2022	GW	051-06075	HOTCHKISS FEDERAL 12-89 18-43	RI
324485	LOCATION	AC			-	DGU Federal 1289 18-43 Pad	RI
436560	WELL	AL	11/17/2022	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 5/6/2025, Western Reclamation Work Lead Trujillo conducted a reclamation inspection at Gunnison Energy's DGU Federal 1289 18-43 Pad location in Gunnison County, Colorado.

This inspection is a followup to #696203551, #696204284, #696205082, #696205822 and #696206402 to document compliance with the following corrective actions:

- 1003/1004 Reclamation Requirements
- Stormwater
- Excavation Fencing and stockpile protections

This inspection is also a follow-up to NOAV #403347260.

It was observed that this Location remains out of compliance with ECMC Rules, as well as NOAV and Inspection 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 inspection that have not been addressed are still applicable.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

Type	Area	Volume		

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type			
Comment:	<p>Previous inspection observed excavations throughout the Location were missing required fencing, and that the stockpiles were missing BMPs pursuant to Rule 1002.c and 1002.f. Inspection required Operator to comply with Rules 913.b, 1002.c and 1002.f.</p> <p>Excavations have since been backfilled; CA is no longer applicable however it is noted that no Resolution pursuant to Rule 210.b was submitted showing corrective actions had been taken.</p>		
Corrective Action:		Date:	

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



**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? \_\_\_\_\_

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 [See "COGCC Comments" at the end of this report.](#)

Corrective Action [Comply with Rule 1004.a and removal all surface equipment from the Location.](#)

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: [See "COGCC Comments" at the end of this report.](#)

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:

Previous inspections observed that stormwater and erosion control measures to minimize erosion and degradation are missing or insufficient at the soil stockpile and slopes of the Location. Inspection required Operator to comply with 1002.f and 1002.c

NOAV #403347260 was issued 3/15/2023 requiring Operator to comply with Rule 1002.f by 04/15/2023.

No resolution has been submitted stating work to address the CA was performed; it was observed in this inspection BMPs at the soil stockpile and other slopes of the Location remain missing or insufficient; soils/slopes bare, loose and at risk to wind and water erosion. CA has not been addressed and remains applicable.

Corrective Action:

Comply with Rule 1002.f and 1002.c

Date:

Pits:

☐ NO SURFACE INDICATION OF PIT

Permit:

Facility ID	Permit Num	Expiration Date
284075	1433361	
284075	1433361	

**ECMC Comments**

Comment	User	Date
<p><b>RECLAMATION COMMENTS</b></p> <p>Previous inspections observed areas of the Location not needed for production, and required Operator to comply with 1003 rules and to conduct interim reclamation by 5/31/2022.</p> <p>NOAV #403347260 was issued on 3/15/2023 requiring Operator to comply with Rule 1003.b by 4/15/2023.</p> <p>Operator filed Docket No. 230500138 on 5/1/2023 requesting a 502.b variance to waive requirements of Rule 1003.b, and performing interim reclamation of areas not reasonably necessary for production operations.</p> <p>Wells on the Location have since been plugged and abandoned; Well 051-06075 was P&amp;A on 7/9/2024 (Form 6(s) 403899880); Well 051-06126 was P&amp;A 7/3/2024 (Form 6(s) 403899884). Location is now subject to 1004 Final Reclamation requirements.</p> <p>Pursuant to Rule 1004.a, upon the plugging and abandonment of a well, all debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well.</p> <p>Inspection #696206402 observed that surface (pipe) equipment on the east end of the Location has not been removed; all equipment was required to be removed by 10/9/2024. Inspection required Operator to comply with Rule 1004.a.</p> <p>It was observed in this inspection that the surface pipe equipment has not been removed. This CA has not been addressed and remains applicable.</p> <p><b>ADDITIONAL RECLAMATION COMMENT:</b></p> <p>All facilities on the Location have received final closure pursuant to Rule 911; remediation project #36204 has been closed. Final Reclamation work including, but not limited to, removal of gravel, compaction alleviation, recontouring/regrading, replacement of topsoil and revegetation activities at the Location and access road is required by 7/9/2025.</p>	trujilloam	05/08/2025

### **Attached Documents**

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

Document Num	Description	URL
718100510	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7041468">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=7041468</a>