

**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:

08/23/2021

Submitted Date:

08/27/2021

Document Number:

696203083**FIELD INSPECTION FORM**Loc ID 324169 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10163Name of Operator: NONSUCH NATURAL GAS INCAddress: P O BOX 110066City: NAPLES State: FL Zip: 34108**Status Summary:**

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

Findings:6 Number of Comments4 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
		shaun.kellerby@state.co.us	
		dlee@nng.us.com	
De Paolo, Corey		corey.depaulo@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Heil, John		john.heil@state.co.us	
,		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
261024	WELL	PR	08/17/2001	GW	045-07928	CSOC 697-22 1	RI
292475	PIT	AC			-	CSOC 697-22 1	AC
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	RI

General Comment:

On 8/23/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Nonsuch Natural Gas Inc's CSOC 697-22 #1 location in Garfield County, Colorado.

This inspection is a followup to:

#696201613 dated 8/4/2020;

#696201798 dated 9/16/2020;

#696201986 dated 11/2/2020;

#701101602 dated 6/14/2021;

and #696202914 dated 7/12/2021 to document compliance with the following corrective actions:

909.e: Hydrocarbons in pit

1002.f: Stormwater

1003.a: Interim Reclamation

1003.f: Noxious Weeds

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

Refer to the "Good Housekeeping", "Reclamation", "Stormwater" and "Pit" 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.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	<p>Previous inspections observed noxious weeds on the Location. Inspections required Operator to comply with Rule 1003.f, and to perform ongoing weed monitoring and management.</p> <p>It was observed in this inspection that noxious weeds remain evident on the Location; Houndstongue plants observed to have matured with viable seeds.</p> <p>No Resolution Form has been submitted by Operator to document that corrective action was addressed.</p> <p>Ongoing noxious weed monitoring and management remains inadequate on the Location; corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 1003.f and Rule 606.c, and conduct weed management. Ongoing weed monitoring/management is required until Location receives a passing final reclamation inspection		Date: 07/20/2021

Overall Good: ☐**Spills:**

Type	Area	Volume		
------	------	--------	--	--

In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>261024</u>	Type:	<u>WELL</u>	API Number:	<u>045-07928</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>292475</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>AC</u>
Facility ID:	<u>324169</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

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? **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 _____ Recontoured _____ 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

Previous inspections documented that the interim areas of the Location are not progressing towards COGCC 1003 reclamation standards; Soils on interim areas predominantly bare and exposed; Soils appear to be subsoils. Inspections required Operator to conduct additional reclamation and ensure erosion controls are implemented to stabilize the seeded soils by 10/31/2020.

Unable to find evidence that additional reclamation was performed and control measures to stabilize the seeded soils installed per the corrective actions; No Resolution Form has been submitted by Operator to document that corrective action has been addressed.

Original CA and date remains applicable.

Corrective Action

Comply with 1003 rules and conduct additional reclamation: Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Implement erosion controls to stabilize the seeded soils, and continue to monitor and manage this site until Final Reclamation has passed.

Date **10/31/2020**

Overall Interim Reclamation **Fail**

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 _____ 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: Previous inspections documented that BMPs to stabilize/protect the cut/fill slopes of the Location, and to prevent off-site sediment transport were missing or insufficient.

Inspections required Operator to comply with Rule 1002.f by 10/31/2020.

It was observed in this inspection that BMPs remain missing or insufficient to stabilize/protect the cut/fill slopes, prevent degradation, and off-site sediment transport.

In addition, it was observed in this inspection that BMPs to stabilize, manage runoff, and minimize erosion are missing or insufficient at the access road; erosion degradation and offsite sediment transport observed on road.

Original corrective action and date remains applicable.

Corrective Action: **Comply with Rule 1002.f**

Date: 10/31/2020

Pits: ☐ NO SURFACE INDICATION OF PIT

Type: Skimming/Settling Lined: YES Pit ID: 292475 Lat: 39.514030 Long: -108.200000

Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: HDPE Liner Condition: _____

Comment: _____

Corrective Action

Date: _____

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective Action

Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment: _____

Corrective Action

Date: _____

Anchor Trench Present:

Oil Accumulation: YES

2+ feet Freeboard:

Comment:	Inspection #701101602 and #696202914 observed oil accumulation in the pit. Inspections required Operator to contact COGCC EPS John Heil and remove oil from pit by 6/18/2021. It was observed in this inspection that oil accumulation remains in the pit; Operator failed to remove oil from pit per Rule 909.e; no Resolution Form has been submitted by Operator to document that corrective action has been addressed, and that COGCC Environmental Group was contacted; original CA and date of 6/18/2021 remains applicable.	Date: <u>06/18/2021</u>
Corrective Action	Contact COGCC EPS John Heil. Comply with Rule 909.e and remove oil from pit.	

COGCC Comments

Comment	User	Date
Soils observed on interim areas not reflective of the topsoil observed on the adjacent reference areas. It does not appear as though topsoil replacement and proper seed-bed prep was performed on this location	trujilloam	08/27/2021

Attached Documents

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

Document Num	Description	URL
402795347	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517963
696203084	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517948