

**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:

696203087**FIELD INSPECTION FORM**Loc ID 453726 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
,		dnr_cogccenforcement@state.co.us	
Lee, David	239-289-9046	dlee@nng.us.com	

**General Comment:**

On 8/23/2021, Reclamation Specialist Trujillo conducted inspected Nonsuch Natural Gas Inc's CSOC TB Location in Garfield County, Colorado.

This inspection is a followup to:

#696201797 dated 9/16/2020;

#696201822 dated 9/24/2020;

#696201988 dated 11/02/2020

and #696202916 dated 7/12/2021 to document compliance with the following corrective actions:

606: Unused or unneeded equipment on the Location

606: Good Housekeeping

1002.f: Stormwater

1003.f: Noxious weeds

1200: Wildlife Protection measures

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

Refer to the "Good Housekeeping", "Equipment", "Reclamation", "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.

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

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	UNUSED EQUIPMENT		
Comment:	<p>Previous inspections documented equipment on the Location (200 bbl tank, 500 gallon methanol tank, separator) that did not appear to be active, or necessary for production activities on the Location.</p> <p>Operator was required to submit a Form 4 sundry with records identifying equipment's current status and use for production on the Location by 10/2/2020.</p> <p>To date the 200 bbl tank has been removed, however no sundry with documentation has been submitted by Operator per the corrective action.</p> <p>Equipment is considered unused equipment not necessary for use on the Location.</p>		
Corrective Action:	Comply with Rule 606.a and remove equipment not necessary for use on the Location.	Date:	10/02/2020
Type	UNUSED EQUIPMENT		
Comment:	<p>Previous inspections documented unused pipe equipment stored behind the methanol tank. Inspections required Operator to comply with Rule 603.f (now Rule 606).</p> <p>It was observed in this inspection that the various unused pipe remains improperly stored on the Location, behind the methanol tank.</p> <p>This corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 606 and remove unused equipment.	Date:	11/10/2020

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type: Bird Protectors	#		corrective date
Comment:	<p>Inspection #696202916 observed that protection equipment to prevent wildlife access to the secondary containment BMP at the 500 gallon Methanol tank, and the Separator were missing or inadequate. Inspection Required Operator to install or repair wildlife protection equipment by 7/18/2021.</p> <p>It was observed in this inspection that protection equipment to prevent wildlife access to the secondary containment BMP at the tank, and separator remain missing or inadequate.</p>		
Corrective Action:	Install or repair wildlife protection equipment		Date: 07/18/2021

**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: \_\_\_\_\_

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? \_\_\_\_\_ I \_\_\_\_\_

Comment

Inspection #696202916 observed that ongoing noxious weed monitoring/management on the Location was inadequate; Noxious weeds (Musk thistle, Houndstongue) observed on the Location and access road. Inspection required Operator to comply with Rule 1003.f.

It was observed in this inspection that additional noxious weed management appears to have been conducted; it is noted however that a Field Inspection Report Resolution Form was not submitted by the Operator upon completion of the corrective action in accordance with Rule 210.b.

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 \_\_\_\_\_

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 \_\_\_\_\_

Inspector Name: Trujillo, Aaron

Comment:		Date
Corrective Action:		
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:	<p>Inspection #696202916 observed that BMPs to protect and stabilize unpaved areas of the Location and access road, and to allow for sediment laden-free stormwater discharge are missing, or insufficient; stormwater runoff resulted in erosion degradation and offsite sediment discharge at Location entrance and access road. Inspection required Operator to comply with Rule 1002.f.(2)C.</p> <p>It was observed in this inspection that BMPs to protect and stabilize unpaved areas of the Location and access road, and to allow for sediment laden-free stormwater discharge remain missing, or insufficient. CA has not been addressed and remains applicable.</p>	Date: 07/20/2021
Corrective Action:	<p>Install or repair required BMPs per Rule 1002.f.(2)C. Ensure control measures are installed in accordance with good engineering practices, and maintained in proper functioning condition.</p>	

**Pits:** ☐ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
402795348	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517964">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517964</a>
696203088	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517950">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5517950</a>