

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:

07/12/2021

Submitted Date:

07/13/2021

Document Number:

696202914

## FIELD INSPECTION FORM

 Loc ID 324169 Inspector Name: Trujillo, Aaron On-Site Inspection  2A Doc Num:
**Status Summary:**

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

**Operator Information:**
 OGCC Operator Number: 10163  
 Name of Operator: NONSUCH NATURAL GAS INC  
 Address: P O BOX 110066  
 City: NAPLES State: FL Zip: 34108
**Findings:**

- 6 Number of Comments  
 4 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 |
|-----------------|--------------|-------------------------------|---------|
| , COGCC         |              | shaun.kellerby@state.co.us    |         |
| Arthur, Denise  |              | denise.arthur@state.co.us     |         |
| Heil, John      |              | john.heil@state.co.us         |         |
| Lee, David      | 239-289-9046 | dlee@nng.us.com               |         |
| Longworth, Mike |              | michael.longworth@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<br>22NENE | RI          |

**General Comment:**

On 7/12/2021, 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;  
and #701101602 dated 6/14/2021 to document compliance with the following corrective actions:

909.e: Hydrocarbons in pit  
1002.f: Stormwater  
1003.a: Interim Reclamation

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

Additional compliance issues observed during this inspection:  
1003.f: Noxious weeds

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; see inspection #701101602 for corrective actions regarding compliance with Rule 605.h

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

WEEDS

Comment:

Corrective action regarding 1003.f noxious weed management is being addressed here, in order to allow Operator the ability to address CA within a FIRR:

Previous inspections observed noxious weeds on the Location. Inspections required Operator to comply with Rule 1003.f, and to perform ongoing weed monitoring/management.

Noxious weeds (Houndstongue, Bull thistle) observed during this inspection on interim and production areas of the Location.

Ongoing noxious weed monitoring and management inadequate on Location.

Corrective Action:

Comply with Rule 1003.f 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: 261024 Type: WELL API Number: 045-07928 Status: PR Insp. Status: RI

Facility ID: 292475 Type: PIT API Number: - Status: AC Insp. Status: AC

Facility ID: 324169 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**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 \_\_\_\_\_

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 REVEGETATION

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail 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? F

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. Noxious weeds observed (See good housekeeping).  
  
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.  
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: Adequate

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 observed oil accumulation in the pit. Inspection required Operator to contact COGCC EPS John Heil by 6/18/2021.  
Reclamation Specialist contacted EPS John Heil regarding the corrective action; EPS Heil stated that the Environmental group was not contacted regarding oil accumulation per the corrective action.  
It was observed in this inspection that oil accumulation remains in the pit; Operator failed to remove oil from pit per Rule 909.e, or contact COGCC Environmental per the corrective actions, therefore the CA date of 6/18/2021 will remain applicable.

|                   |  |                         |
|-------------------|--|-------------------------|
| Corrective Action | <p>Contact COGCC EPS John Heil.</p> <p>Comply with Rule 909.e and remove oil from pit.</p> | Date: <u>06/18/2021</u> |
|-------------------|--|-------------------------|

#### 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 | 07/13/2021 |

#### Attached Documents

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

| Document Num | Description          | URL   |
|--------------|----------------------|---|
| 402746482    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478045">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478045</a> |
| 696202915    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478034">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478034</a> |