

**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:

11/01/2021

Submitted Date:

11/02/2021

Document Number:

696203322

**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:**

- 7 Number of Comments
- 5 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
		dlee@nng.us.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
292475	PIT	AC	09/27/2007		-	CSOC 697-22 1	AC
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	RI

**General Comment:**

On 11/01/2021, 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;  
 #696202914 dated 7/12/2021;  
 and #696203083 dated 8/23/2021 to document compliance with the following corrective actions:

- Hydrocarbons in pit
- Stormwater
- Interim Reclamation
- Noxious Weeds

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

New observed compliance issues:  
 -Missing wildlife protection devices

Refer to the "Location", "Reclamation", "Stormwater" and "Pits" 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

WEEDS

Comment:

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.

Weeds observed on Location dead; it is unclear if weeds have died due to the onset of winter conditions, or if management activities were performed by the Operator; no Resolution Form has been submitted by Nonsuch to document that the corrective action was addressed.

The Location will remain out of compliance with Rule 1003.f/606.c and a followup inspection will be conducted in the following growing season.

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?

**Equipment:**

corrective date

Type:

# 2

Comment:

It was observed in this inspection that wildlife protection devices to prevent wildlife access were missing from the secondary containment BMPs of the two methanol tanks onsite. See Photo 1.

Corrective Action:

Install or repair wildlife protection equipment.

Date: 11/07/2021

**Venting:**

Yes/No

Comment:

Corrective Action:

Date:

**Flaring:**

Type

Comment:

Corrective Action:

Date:

**Inspected Facilities**

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 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 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; 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.

Previous inspections also observed that control measures to manage runoff and minimize erosion are missing or insufficient at the access road.

It was observed in this inspection that control measures remain missing or insufficient to stabilize, minimize erosion, manage runoff and prevent off-site sediment transport from the Location (cut/fill slopes and access 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: \_\_\_\_\_ Lined: YES Pit ID: 292475 Lat: 39.514030 Long: -108.200000

Reference Point: \_\_\_\_\_ Other: \_\_\_\_\_ Length: \_\_\_\_\_ Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ 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: \_\_\_\_\_ 2+ feet Freeboard: \_\_\_\_\_

Comment: Previous inspections 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

Corrective Action	Comply with Rule 909.e and remove oil from pit			Date: 06/18/2021
Permit:	Facility ID	Permit Num	Expiration Date	
	292475	400784065		
	292475	400784065		
	418328	2607827		
	292475	1433719		

**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	11/02/2021

**Attached Documents**

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

Document Num	Description	URL
696203323	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5570084">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5570084</a>