

**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 FORMLoc ID 324169 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10163

Name of Operator: NONSUCH NATURAL GAS INC

Address: P O BOX 110066

City: NAPLES State: FL Zip: 34108

Status Summary:

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

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.

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>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.</p> <p>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.</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: <u>07/20/2021</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

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

Type:	# 2		corrective date
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: <u>11/07/2021</u>

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 10/31/2020Overall 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	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5570084