

**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:

08/30/2022

Submitted Date:

09/01/2022

Document Number:

696204028

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
- 3 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
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	RI

General Comment:

On 8/30/2022, 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;
#696203083 dated 8/23/2021;
#696203322 dated 11/1/2021;
and #696203530 dated 3/28/2022 to document compliance with the following corrective actions:

- Stormwater
- Interim Reclamation
- Noxious Weeds
- Wildlife Protection Devices

This inspection is also a followup to NOAV #403104457

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

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.

It was observed in this inspection that ongoing weed management has been inadequate; noxious weeds, including houndstongue, observed on Location, including interim areas.

Corrective action and date remains applicable.

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:

Previous inspection observed that wildlife protection devices to prevent wildlife access were missing from the secondary containment BMPs of the methanol tanks adjacent to the well head and separator equipment. Inspection required Operator to install or repair wildlife protection equipment.

It was observed in this inspection that wildlife protection devices remain missing or insufficient from the secondary containment of the two methanol tanks; Operator appears to have placed a net over the larger tank, however BMP has not been installed or maintained per good engineering practices; wildlife protection devices remain missing from tank adjacent to well.

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: 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 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

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 _____

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
<p>Comment: Previous inspections documented that BMPs to stabilize/protect, and manage runoff in a manner that minimizes erosion, degradation and sediment transport from the cut/fill slopes and access road of the Location were missing or insufficient. Inspections required Operator to comply with Rule 1002.f.</p> <p>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); erosion degradation has persisted.</p> <p>Original corrective action and date remains applicable.</p>						
Corrective Action: Comply with Rule 1002.f					Date: <u>10/31/2020</u>	
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

COGCC Comments		
Comment	User	Date
<p>RECLAMATION COMMENTS</p> <p>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.</p> <p>In addition to inspection reclamation requirements, corrective actions per NOAV #403104457 also required the following by 8/12/2022:</p> <p>“Operator shall submit an interim reclamation plan, to be approved by COGCC staff for the establishment of vegetation for disturbed areas no longer in use. The plan will include Operator’s approach to monitoring the growth and establishment of vegetation after reseeding and reporting to staff on a bi-annual basis the monitoring data until interim reclamation is complete. Upon completion of work, Operator shall submit documentation of work performed attached to a Field Inspection Report Resolution Form. Documentation shall include, at the least, invoices, the seed mixture provided by surface owner, and date-stamped photographs of the reclamation in sufficiently high resolution so that details are readily discerned”.</p> <p>Unable to find evidence that additional reclamation was performed and control measures to stabilize the seeded soils installed per the corrective actions; no reclamation plan has been submitted by Operator; No Resolution Form has been submitted by Operator to document that corrective action has been addressed, or to provide the required documentation.</p> <p>Location remains out of compliance with 1003 Rules, and NOAV requirements.</p>	trujilloam	09/01/2022

Attached Documents

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

Document Num	Description	URL
403154558	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5846415
696204029	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5846411