

FORM  
INSPRev  
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## 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:

09/27/2023

Submitted Date:

10/09/2023

Document Number:

708200572

### FIELD INSPECTION FORM

Loc ID 483817 Inspector Name: Edwardson, Dylan On-Site Inspection  2A Doc Num: \_\_\_\_\_

**Operator Information:**

OGCC Operator Number: 10790  
Name of Operator: DENOVA SEQUESTRATION LLC  
Address: 5525 WEST 56TH AVENUE SUITE 200  
City: ARVADA State: CO Zip: 80002

**Status Summary:**

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

**Findings:**

- 9 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
GREGG, JESSICA		jessica.gregg@carbonameric a.com	
Hansen, Logan		logan.hansen@state.co.us	
BECKER, JEFF		jeff.baker@carbonamerica.co m	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
483817	LOCATION	AC			-	Denova 1	CI
483939	WELL	DG	04/24/2023		121-11100	Denova 1	CI

**General Comment:**

This is a follow-up Construction and Stormwater Inspection to previous Field Inspection Report (doc #708200178).

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	WEEDS		
Comment:	Undesirable vegetation (e.g. russian thistle and kochia) was observed throughout the location and along the access roads. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606. Location will remain out of compliance until the corrective action has been resolved.	Date:	09/27/2023
Type	DEBRIS		
Comment:	Debris and trash was observed throughout the location and along the access road. Refer to attached inspection photos.		
Corrective Action:	Comply with Rule 606. Location will remain out of compliance until the corrective action has been resolved.	Date:	09/27/2023

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: 483817 Type: LOCATION API Number: - Status: AC Insp. Status: CI

Facility ID: 483939 Type: WELL API Number: 121-11100 Status: DG Insp. Status: CI

**Reclamation - Storm Water - Pit**

**Interim Reclamation:**

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: RANGELAND

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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment This location does not comply with Reclamation rules. Rule 1002.c. states all stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented. Topsoil stockpile has significant weed cover- Russian thistle and Kochia- with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth.

Corrective Action Comply with Rule 1002.c. Best management practices to prevent weed establishment shall be implemented. Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles. If reseeding is an option for long-term protection and stabilization of topsoil, then the next favorable seeding opportunity shall be conducted.  
  
Location will remain out of compliance until the corrective action has been resolved.

Date **09/27/2023**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment This location is not in compliance with Rule 1002.e; or Rules 303.a(2) and 304.a(2) with the approved Form 2A (Doc #402998441). Field data was collected on April 20, 2023, using OnX mapping software, and indicates that the construction activities exceed the permitted disturbance area. It appears the disturbance encompassed approximately 4.64 acres, exceeding the permitted surface disturbance of 2.57 acres by approximately 80%. Additional disturbance was observed on the outside/exterior of the perimeter fencing and was not included in Staff estimates as data was collected from the interior fenceline, suggesting additional disturbance over the 4.64 acres.

Corrective Action Comply with Rules 1002.e, 303.a(2), and 304.a(2). Corrective action date is the date the Date location was observed out of compliance.  
  
As of 10/09/2023, Reclamation Staff has received no correspondence from the Operator about resolution/cure for the overbuilt location and permit violation.

Date **04/20/2023**

1003a. Waste and Debris removed? \_\_\_\_\_

Comment See "Good Housekeeping" section comments.

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? \_\_\_\_\_

Comment

Corrective Action

Date \_\_\_\_\_

Overall Interim Reclamation

**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_

Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: RANGELAND \_\_\_\_\_

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: This location does not comply with Rule 1002.f. During this inspection, Staff observed rill and gully erosion degradation occurring along the access road and the location- including the production areas, topsoil stockpile, and stormwater control measures. Evidence of off-site sediment transport and unstabilized soils was observed, in addition to improperly installed control measures (e.g. straw wattles). This location requires immediate maintenance/repairs of stormwater control measures in order to comply with Rule 1002.f. Refer to attached inspection photos for documentation.

Corrective Action: Comply with Rule 1002.f. Location will remain out of compliance until the corrective action has been resolved.

Date: 09/27/2023

**Pits:**  NO SURFACE INDICATION OF PIT

**COGCC Comments**

Comment	User	Date
<span style="color: blue;">Per Rule 1002.f., oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices.</span>	edwardsond	10/09/2023

**Attached Documents**

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

Document Num	Description	URL
708200598	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6278424">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6278424</a>