

**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:

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: 10790Name of Operator: DENOVA SEQUESTRATION LLCAddress: 5525 WEST 56TH AVENUE SUITE 200City: 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 Comments5 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	
BECKER, JEFF		jeff.baker@carbonamerica.co m	
Hansen, Logan		logan.hansen@state.co.us	

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).

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

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
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

Overall Good: ☐**Spills:**

Type	Area	Volume		
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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 REVEGETATIONCropland

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

At the time of this inspection, it does not appear any interim reclamation activities have been performed. Operator shall comply with interim reclamation timing requirements.

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
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.	edwardsond	10/09/2023

Attached Documents

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

Document Num	Description	URL
403554749	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6278441
708200598	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6278424