

**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:

09/10/2024

Submitted Date:

09/25/2024

Document Number:

708201606

FIELD INSPECTION FORM

Loc ID 483817 Inspector Name: Edwardson, Dylan 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:

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

Findings:

- 7 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
SPREADBURY, CRAIG		craig.spreadbury@carbonamerica.com	
Noto, John		john.noto@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	

Inspected Facilities:

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

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (483817). The previous Field Inspection Report (doc #708201343) was conducted on 06/21/2024.

Any corrective actions from previous inspections that have not been addressed are still applicable.

Location

Overall Good:

Emergency Contact Number:

Comment: Previous FIR (doc #708201343) documented that the emergency contact number was not legible from a distance. At the time of this inspection, it appears that the emergency contact info has been updated with larger font. Refer to attached inspection photos.

Corrective Action:

Date: _____

Good Housekeeping:

Type	STORAGE OF SUPL		
Comment:	Previous FIR (doc #708201343) documented an equipment trailer being stored on location. At the time of this inspection, it appears that the trailer has been moved outside of the fenced location. Operator reported on FIRR (doc #403887583) that the trailer was moved off location with landowner permission. The Operator shall provide documentation of landowner permission to store equipment and submit as an attachment via Form 4 Sundry Notice.		
Corrective Action:		Date:	_____
Type	DEBRIS		
Comment:	This location does not comply with Rule 606. Degraded straw wattles were observed around the topsoil stockpile and are now considered debris. Comply with Rule 606 and remove debris from the location.		
Corrective Action:		Date:	_____

Overall Good:

Spills:			
Type	Area	Volume	

In Containment: No

Comment: Previous FIR (doc #708201343) documented stained soils around the wellhead area. At the time of this inspection, it appears that stained soils have been disposed of. Refer to attached inspection photos.

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: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

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

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

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 _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail

Comment [Previous Field Inspection Reports documented that the location is not in compliance with Rule 1002.e; or Rules 303.a\(2\) and 304.a\(2\) with the approved Form 2A \(doc #402998441\). Warning Letter \(doc #403852863\) was issued on 07/12/2024 and required the Operator to perform the corrective action to submit an Amended Form 2A to accurately update the disturbance acreage; the corrective action deadline date was 09/12/2024. As of 09/25/2024, Form 2A \(doc #403902741\) has an "Uploaded" status but does not appear to have been submitted for review by ECMC staff. Operator shall ensure that the Amended Form 2A includes all updated attachments, as outlined in the Warning Letter, for ECMC Staff review.](#)

Corrective Action **Comply with Rules 1002.e, 303.a(2), and 304.a(2). Corrective action date is the date the location was observed out of compliance. (Original Corrective Action Date: 04/20/2023)**

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? Fail Production areas stabilized ? Fail
 1003c. Compacted areas have been cross ripped? Fail
 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? Fail
 Production areas have been stabilized? Fail Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 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? _____

Comment This location does not comply with Rule 1003. It does not appear that any reclamation activities have been performed since the previous inspection (doc #708201343) conducted on 06/21/2024. Well API #121-11100 was spud 04/24/2023, interim reclamation activities should have been completed by 10/24/2023. The Operator submitted a Form 4 Sundry Notice (doc #403697211) stating that interim reclamation will commence approximately 05/15/2024. This location is approximately 11 months out of compliance with Rule 1003. Operator shall perform reclamation activities immediately or submit a variance hearing application for delayed interim reclamation.

Corrective Action Perform reclamation in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards. Date _____

Overall Interim Reclamation Fail

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. Operator submitted FIRR (doc #403887583) on 08/13/2024 with photo documentation of corrective action work being performed. At the time of this inspection, it was observed that additional stromwater control measures were installed, however, the BMPs still remain inadequate. Erosion control logs are filled with sediment, off-location sediment transfer and erosion degradation was observed along the access road and drilling pad area. Additional maintenance and/or implementation of more robust stormwater control measures/BMPs are required in order to comply with Rule 1002.f. Refer to attached inspection photos for examples.

Corrective Action: Comply with Rule 1002.f.

Date: 09/28/2024

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
708201623	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6721571