

**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 FORMLoc ID 483817 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**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

Status Summary:

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

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.

LocationOverall 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? FailProduction areas stabilized ? Fail1003c. 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? FailProduction areas have been stabilized? FailSegregated soils have been replaced? Fail**RESTORATION AND REVEGETATION**Cropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-CroplandTop soil replaced FailRecontoured Fail80% 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