

**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:

04/07/2025

Submitted Date:

04/08/2025

Document Number:

718700274**FIELD INSPECTION FORM**Loc ID 483817 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**ECMC 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:10 Number of Comments1 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
Park, Jill		jill.park@state.co.us	
Trujillo, Aaron		aaron.trujillo@state.co.us	
		Steve.Freese@state.co.us	
SPREADBURY, CRAIG		craig.spreadbury@carboname rica.com	
Coleman, Chris		chris.coleman@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).

Refer to the previous Field Inspection Report (doc #708201606) conducted on 09/10/2024 for additional information.

Operator submitted FIRR (doc #403972671) on 10/28/2024 stating that corrective actions have been completed.

LocationOverall Good: ☐

Signs/Marker:			
Type			
Comment:	No sign observed at well location. Install sign to comply with Rule 605.d.		
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date: _____
Corrective Action:		

Good Housekeeping:

Type	OTHER		
Comment:	Stained soil was observed throughout the access road.		
Corrective Action:	Conduct maintenance on equipment, cleanup stained material and review self inspection processes per Rule 1002.f.(2).D.	Date:	04/15/2025
Type	DEBRIS		
Comment:	Degraded straw wattles previously observed around the topsoil stockpile appear to have been removed.		
Corrective Action:		Date:	
Type	TRASH		
Comment:	Trash (baler twine) was observed throughout the location. Comply with Rule 606 and remove all trash from location.		
Corrective Action:		Date:	
Type	STORAGE OF SUPL		
Comment:	Equipment trailer previously observed being stored outside of the permitted location appears to have been removed.		
Corrective Action:		Date:	

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:	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 _____ In Process _____

Comment _____

Previous FIRs 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 04/08/2025, Form 2A (doc #403902741) is "In-Process" as ECMC Staff is waiting for the Operator to revise/update the amended Form 2A and associated attachments based on an Operator/ECMC Staff meeting (02/18/2025), and email (02/20/2025) from ECMC Enforcement Staff requesting revisions/updates on the Form 2A and attachments.

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? Fail 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? Fail

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 See Comment Section at the end of this report for additional information.

Corrective Action _____ Date _____

Overall Interim Reclamation In Process

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
<p>Comment: Previous FIR (doc #708201606) documented erosion degradation, inadequate stormwater controls and sediment transport along the access road and the drilling pad. Operator submitted FIRR (doc #403972671) stating that the corrective action was completed. During this inspection, it was observed that additional stormwater control measures appear to have been installed along the access road and drilling pad. Additionally, cut and fill slopes along the drilling pad and access road also appear to have been stabilized with drill rows and crimped mulch evident. One small filterxx wattle appears to have been dislodged and will require additional maintenance. Operator shall continue to monitor and manage the location for stormwater run on and runoff.</p>						
Corrective Action:						Date: _____
Pits: <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

ECMC Comments

Comment	User	Date
INTERIM RECLAMATION COMMENT: This location does not comply with Rule 1003. Operator submitted FIRR (doc #403972671) stating that the corrective action has been completed and additional reclamation activities were done the week of 10/14/2024. It does not appear that any additional reclamation work was conducted as the drilling pad did not appear to be reduced in size only needed for production operations. Cut and fill slopes around the drilling pad and along the access road appeared to have been stabilized with drill rows and crimped mulch evident, however, some portions of unstabilized soils were observed around the topsoil stockpile. At the time of this inspection, this location is approximately 18 months out of compliance with Rule 1003 (API 121-11100spud 04/24/2023; interim reclamation due by 10/24/2023). The Operator has submitted a variance hearing application for delayed interim reclamation (docket #250400051) on 03/31/2025. Therefore, this location will remain "In-Process" until the application is heard by the ECMC Commission. The variance hearing application does not relieve the Operator of any potential ECMC enforcement action for the observed and previously documented noncompliance with Rule 1003.	edwardsond	04/08/2025

Attached Documents

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

Document Num	Description	URL
404157946	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6995438
718700281	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6995433