

**FORM
INSP**Rev
05/11**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

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Inspection Date:
10/08/2015Document Number:
674300436

Overall Inspection:

ALLEGED VIOLATION**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	261024	324169	Spencer, Stan	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 10163Name of Operator: NONSUCH NATURAL GAS INCAddress: P O BOX 110066City: NAPLES State: FL Zip: 34108

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☐ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☒ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Fischer, Alex		alex.fischer@state.co.us	
Longworth, Mike		mike.longworth@state.co.us	
Gowen, Peter		peter.gowen@state.co.us	
Lujan, Carlos		carlos.lujan@state.co.us	
Nagy, Steven	303 796-2626	snagy@bfwlae.com	legal rep for Nonsuch
Lee, David	239-289-9046	dlee@ngg.us.com	
Mah, Steven		steven.mah@state.co.us	

Compliance Summary:QtrQtr: NENE Sec: 22 Twp: 6S Range: 97W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/03/2015	674300372	PR	PR	ALLEGED VIOLATION			Yes
09/28/2010	1949076	ES	PR	ACTION REQUIRED			
07/28/2010	1949072	CO	PR	ACTION REQUIRED			Yes
09/30/2009	200219090	CO	PR	ACTION REQUIRED			Yes
11/10/2008	200198278	PR	PR	ACTION REQUIRED	I		Yes
09/01/2008	200206565	PR	PR	SATISFACTORY			No
07/25/2008	200192844	PR	PR	ACTION REQUIRED	I		Yes
06/12/2008	200195268	PR	WO	ACTION REQUIRED	I		Yes
06/13/2007	200117613	PR	PR	ACTION REQUIRED			Yes
07/07/2005	200076106	PR	PR	SATISFACTORY		Pass	No
08/22/2002	200032794	PR	PR	SATISFACTORY		Pass	No

Inspector Comment:

Inspector Name: Spencer, Stan

Follow up inspection by Stan Spencer. Pit has floating condensate/oil/paraffin on ~ 1/3 of surface. No net is in place although infrastructure for net is in place. This allows for possible wildlife/migratory bird access to petroleum impacted water. This is a violation of Rule 902 C which states in part: A Form 15, Earthen Pit Report/Permit, may be revoked by the Director and the Director may require that the pit be closed if an operator repeatedly allows more than de minimis amounts of oil or condensate to accumulate in a pit. This requirement is not applicable to properly permitted and properly fenced, lined, and netted skim pits that are designed, constructed, and operated to prevent impacts to wildlife, including migratory birds. This pit has had six prior consecutive inspections including: 8/3/15, 7/30/15, 9/24/14, 6/27/14, 9/4/13, and 8/2/13 all of which recorded observing floating oil on the surface of the pit and the absence of netting. Inspection #674300372 on 8/3/15 recorded these conditions as a violation of Rule 902 C and required corrective action of "Properly net pit. Remove oil every 24 hours and do not let oil accumulate" by 8/21/15. In response to this inspection, Nonsuch submitted a Form-4 on 9/29/15 #400907422 which stated "We have removed all fluids from this pit. We have inspected the pit liner and determined it to be in good working condition. We have returned the pit to service. We will monitor pit fluid and skim oil from top of pit when it accumulated to a de minimis amount." The Form-4 did not address the requirement for netting and as noted above, free floating petroleum was again observed on the pit 10/8/15 (see photo attachments).

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
261024	WELL	PR	08/17/2001	GW	045-07928	CSOC 697-22 1	PR	
292475	PIT	AC	09/27/2007		-	CSOC 697-22 1	AC	
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	AC	
418328	PIT		07/16/2010		-	DANISH FLATS		

Equipment:

Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

Location

Emergency Contact Number (S/A/V): _____ Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

Type	Area	Volume	Corrective action	CA Date
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☐ Multiple Spills and Releases?

Venting:

Yes/No	Comment

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 261024

Site Preparation:

Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/A/V: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:**S/A/V:** _____ **Comment:** _____**CA:** _____ **Date:** _____**Wildlife BMPs:****S/A/V:** _____ **Comment:** _____**CA:** _____ **Date:** _____**Stormwater:****Comment:** _____**Staking:****On Site Inspection (305):**Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:Summary of Operator Response to Landowner Issues:Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:**Facility**

Facility ID: 0 Type: _____ API Number: - Status: _____ Insp. Status: _____

Environmental**Spills/Releases:**

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

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Corrective Action: Properly net pit. Remove oil every 24 hours and do not let oil accumulate

Date: 10/23/2015

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

DWR Receipt Num: _____ Owner Name: _____ GPS : _____ Lat _____ Long _____

Field Parameters:

Sample Location: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1003a. Debris removed? _____ CM _____ CA _____ CA Date _____
Waste Material Onsite? _____ CM _____ CA _____ CA Date _____
Unused or unneeded equipment onsite? _____ CM _____ CA _____ CA Date _____
Pit, cellars, rat holes and other bores closed? _____ CM _____ CA _____ CA Date _____
Guy line anchors removed? _____ CM _____ CA _____ CA Date _____
Guy line anchors marked? _____ CM _____ CA _____ CA Date _____

1003b. Area no longer in use? _____ Production areas stabilized ? _____

Inspector Name: Spencer, Stan

- 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 _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

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 _____

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

S/A/V: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	418328	2607827	

Inspector Name: Spencer, Stan

292475	400784065	
292475	400784065	
292475	1433719	

Attached Documents

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

Document Num	Description	URL
674300437	oil on pit	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3702054
674300438	closeup of floating petroleum	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3702055
674300439	hose on liner, no net	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3702056