

**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

DE ET OE ES

Inspection Date:

10/08/2015

Document Number:

674300442

Overall Inspection:

**ALLEGED VIOLATION****FIELD INSPECTION FORM**

|                     |             |        |                 |                          |             |
|---------------------|-------------|--------|-----------------|--------------------------|-------------|
| Location Identifier | Facility ID | Loc ID | Inspector Name: | On-Site Inspection       | 2A Doc Num: |
|                     | 263296      | 324193 | 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 |
|-----------------|--------------|----------------------------|---------|
| Lujan, Carlos   |              | carlos.lujan@state.co.us   |         |
| Mah, Steven     |              | steven.mah@state.co.us     |         |
| Lee, David      | 239-289-9046 | dlee@ngg.us.com            |         |
| Fischer, Alex   |              | alex.fischer@state.co.us   |         |
| Longworth, Mike |              | mike.longworth@state.co.us |         |
| Gowen, Peter    |              | peter.gowen@state.co.us    |         |

**Compliance Summary:**QtrQtr: SWSW Sec: 12 Twp: 6S Range: 97W

| Insp. Date | Doc Num   | Insp. Type | Insp Status | Satisfactory<br>/Action Required | PA<br>P/F/I | Pas/Fail<br>(P/F) | Violation<br>(Y/N) |
|------------|-----------|------------|-------------|----------------------------------|-------------|-------------------|--------------------|
| 08/03/2015 | 674300366 | PR         | PR          | ALLEGED VIOLATION                |             |                   | Yes                |
| 09/30/2009 | 200219088 | CO         | PR          | ACTION REQUIRED                  |             |                   | Yes                |
| 11/10/2008 | 200198276 | PR         | PR          | SATISFACTORY                     | I           |                   | No                 |
| 07/25/2008 | 200192840 | PR         | PR          | ACTION REQUIRED                  | I           |                   | Yes                |
| 07/13/2004 | 200072369 | PR         | PR          | SATISFACTORY                     | I           | Fail              | No                 |

**Inspector Comment:**

This was a follow-up inspection to 8/3/15 which noted violations due to netting and liner issues. Nonsuch submitted an F-4 on 9/29/15 stating "We have removed all fluids from the pit at this location. We have steam cleaned and inspected the pit liner. We have concluded the liner is in good condition. We have repaired all holes in the mesh netting. We have covered the pit with the mesh netting. We have returned the pit to service. We have removed all weeds from this location. There has not been a release of fluids from this pit." Some repairs have been made to netting and weeds have been removed. However, holes remain in the net at NE and NW corners. Gaps under netting also allow for possible wildlife/migratory bird access. 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." A hole in liner 5-6" diameter at near top of pit first observed on 8/3/15 has not been repaired. Pit waterline indicates pit has been filled to near top of pit wall in the past. This is a violation of Rule 902 B. "Pits shall be constructed, monitored, and operated to provide for a minimum of two (2) feet of freeboard at all times between the top of the pit wall at its point of lowest elevation and the fluid level of the pit. A method of monitoring and maintaining freeboard shall be employed. Any unauthorized release of fluids from a pit shall be subject to the reporting requirements of Rule 906." requirements of Rule 906."

**Related Facilities:**

Inspector Name: Spencer, Stan

| Facility ID | Type     | Status | Status Date | Well Class | API Num   | Facility Name                | Insp Status |                          |
|-------------|----------|--------|-------------|------------|-----------|------------------------------|-------------|--------------------------|
| 263296      | WELL     | PR     | 08/15/2002  | GW         | 045-08120 | CSOC 697-12 1                | PR          | <input type="checkbox"/> |
| 292476      | PIT      | AC     | 09/27/2007  |            | -         | CSOC 697-12 1                | AC          | <input type="checkbox"/> |
| 324193      | LOCATION | AC     | 04/14/2009  |            | -         | CSOC 697-12-66S97W<br>12SWSW | AC          | <input type="checkbox"/> |

**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 |
|------|------|--------|-------------------|---------|
|------|------|--------|-------------------|---------|

☐ Multiple Spills and Releases?

**Venting:**

| Yes/No | Comment |
|--------|---------|
|        |         |

**Flaring:**

| Type | Satisfactory/Action Required | Comment | Corrective Action | CA Date |
|------|------------------------------|---------|-------------------|---------|
|      |                              |         |                   |         |

**Predrill**

Location ID: 263296

**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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This was a follow-up inspection to 8/3/15 which noted violations due to netting and liner issues. Nonsuch submitted an F-4 on 9/29/15 stating "We have removed all fluids from the pit at this location. We have steram cleaned and inspected the pit liner. We have concluded the liner is in good condition. We have repaired all holes in the mesh netting. We have covered the pit with the mesh netting. We have returned the pit to service. We have removed all weeds from this location. There has not been a release of fluids from this pit." Some repairs have been made to netting and weeds have been removed. However, holes remain in the net at NE and NW corners. Gaps under netting also allow for possible wildlife/migratory bird access. 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." A hole in liner 5-6" diameter at near top of pit observed 8/3/15 has not been repaired. Pit waterline indicates pit has been filled to near top of pit wall in the past. This is a violation of Rule 902 B. "Pits shall be constructed, monitored, and operated to provide for a minimum of two (2) feet of freeboard at all times between the top of the pit wall at its point of lowest elevation and the fluid level of the pit. A method of monitoring and maintaining freeboard shall be employed. Any unauthorized release of fluids from a pit shall be subject to the reporting requirements of Rule 906."

Corrective Action: Repair liner and holes in netting

Date: 11/20/2015

Reportable: \_\_\_\_\_

GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_

Proximity to Surface Water: \_\_\_\_\_

Depth to Ground Water: \_\_\_\_\_

**Water Well:**

Lat \_\_\_\_\_ Long \_\_\_\_\_

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**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 \_\_\_\_\_

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- 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 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 |
|---------|-------------|------------|-----------------|
|         | 292476      | 1433720    |                 |

Inspector Name: Spencer, Stan

|        |           |  |
|--------|-----------|--|
| 292476 | 400779880 |  |
| 292476 | 400779880 |  |

### **Attached Documents**

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

| Document Num | Description                         | URL   |
|--------------|-------------------------------------|---|
| 674300443    | hole in liner-camera case for scale | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703688">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703688</a> |
| 674300444    | hole in net                         | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703690">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703690</a> |
| 674300446    | past waterline < 2ft of freeboard   | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703692">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3703692</a> |