

**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:

07/12/2021

Submitted Date:

07/13/2021

Document Number:

696202916**FIELD INSPECTION FORM**Loc ID 453726 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC Operator Number: 10163Name of Operator: NONSUCH NATURAL GAS INCAddress: P O BOX 110066City: NAPLES State: FL Zip: 34108**Status Summary:**

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

Findings:6 Number of Comments5 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
Lee, David	239-289-9046	dlee@nng.us.com	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
453726	LOCATION	AC			-	CSOC TB Location	RI
453727	TANK BATTERY	AC	01/12/2018		-	CSOC 697-14 Tank Battery	RI

General Comment:

On 7/12/2021, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Nonsuch Natural Gas Inc's CSOC 697-22 #1 location in Garfield County, Colorado.

This inspection is a followup to:

#696201797 dated 9/16/2020;

#696201822 dated 9/24/2020;

and #696201988 dated 11/02/2020 to document compliance with the following corrective actions:

606: Unused or unneeded equipment on the Location

606: Good Housekeeping

It was observed in this inspection that the Location remains out of compliance with COGCC Rules and corrective actions.

Additional compliance issues observed during this inspection:

1002.f: Stormwater

1003.f: Noxious weeds

1200: Wildlife Protection measures

Refer to the "Good Housekeeping", "Equipment", "Reclamation" and "Stormwater" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	UNUSED EQUIPMENT		
Comment:	<p>Previous inspections documented unused pipe equipment stored behind the methanol tank. Inspections required Operator to comply with Rule 603.f (now Rule 606).</p> <p>It was observed in this inspection that the various unused pipe remains improperly stored on the Location, behind the methanol tank.</p> <p>This corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 606 and remove unused equipment.	Date:	11/10/2020
Type	UNUSED EQUIPMENT		
Comment:	<p>Previous inspections documented equipment on the Location (200 bbl tank, 500 gallon methanol tank, separator) that did not appear to be active, or necessary for production activities on the Location.</p> <p>Operator was required to submit a Form 4 sundry with records identifying equipment's current status and use for production on the Location by 10/2/2020.</p> <p>To date the 200 bbl tank has been removed, however no sundry with documentation has been submitted by Operator per the corrective action.</p> <p>Corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Submit, attached to a Form 4, documentation identifying whether or not equipment is active, and the equipment's current application for production activities is on the Location.	Date:	10/02/2020
	OR		
	Comply with Rule 606.a and remove equipment not necessary for use on the Location.		

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Equipment:**

Type: Bird Protectors	#		corrective date
Comment:	It was observed in this inspection that protection equipment to prevent wildlife access to the secondary containment BMP at the 500 gallon Methanol tank, and the Separator are missing or inadequate.		
Corrective Action:	Install or repair wildlife protection equipment.		Date: 07/18/2021

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>453726</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>453727</u>	Type:	<u>TANK</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

Reclamation - Storm Water - Pit**Interim Reclamation:**

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

Land Use: _____

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 _____

Comment _____

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? _____ 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? **Fail** Segregated soils have been replaced? _____

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? _____ F

Comment Ongoing noxious weed monitoring/management on the Location inadequate; Noxious weeds (Musk thistle, Houndstongue) have re-established on the Location and access road.

Corrective Action Comply with Rule 1003.f. Ongoing noxious weed monitoring/management required until Location receives a passing final reclamation inspection.

Date **07/27/2021**

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 _____

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:

It was observed in this inspection that BMPs to protect and stabilize unpaved areas of the Location and access road, and to allow for sediment laden-free stormwater discharge are missing, or insufficient; stormwater runoff has resulted in erosion degradation and offsite sediment discharge at Location entrance and access road.

Corrective Action:

Install or repair required BMPs per Rule 1002.f.(2)C. Ensure control measures are installed in accordance with good engineering practices, and maintained in proper functioning condition.

Date: 07/20/2021

Pits: ☐ NO SURFACE INDICATION OF PIT**Attached Documents**

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

Document Num	Description	URL
696202917	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478035