

**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: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

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

**Findings:**

- 6 Number of Comments
- 5 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.

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
Emergency Contact Number:			
Comment:			
Corrective Action:			Date: _____
<b>Good Housekeeping:</b>			
Type	UNUSED EQUIPMENT		
Comment:	<p style="color: blue;">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 style="color: blue;">It was observed in this inspection that the various unused pipe remains improperly stored on the Location, behind the methanol tank.</p> <p style="color: blue;">This corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 606 and remove unused equipment.		Date: <u>11/10/2020</u>
Type	UNUSED EQUIPMENT		
Comment:	<p style="color: blue;">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 style="color: blue;">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 style="color: blue;">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 style="color: blue;">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: <u>10/02/2020</u>
OR			
Comply with Rule 606.a and remove equipment not necessary for use on the Location.			
Overall Good: <input type="checkbox"/>			

<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment: <span style="border: 1px solid black; display: inline-block; width: 600px; height: 20px;"></span>			
<input type="checkbox"/> Multiple Spills and Releases?			

<b>Equipment:</b>			corrective date
Type: Bird Protectors	#		
Comment: <span style="color: blue;">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.</span>			
Corrective Action: <span style="color: red;">Install or repair wildlife protection equipment.</span>			Date: <u>07/18/2021</u>

<b>Venting:</b>			
Yes/No			
Comment:			
Corrective Action:			Date:

<b>Flaring:</b>			

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 453726 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 453727 Type: TANK API Number: - Status: AC Insp. Status: RI

**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 REVEGETATION

Cropland

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	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478035">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5478035</a>