

**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:

04/20/2023

Submitted Date:

04/27/2023

Document Number:

708200178

FIELD INSPECTION FORMLoc ID 483817 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10790

Name of Operator: DENOVA SEQUESTRATION LLC

Address: 5525 WEST 56TH AVENUE SUITE 200

City: ARVADA State: CO Zip: 80002

Status Summary:

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

Findings:

12 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
BECKER, JEFF		jeff.baker@carbonamerica.com	
GREGG, JESSICA		jessica.gregg@carbonamerica.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
483817	LOCATION	AC			-	Denova 1	CI
483939	WELL	DG	04/24/2023		121-11100	Denova 1	CI

General Comment:

This is a follow-up Construction and Stormwater Inspection to previous Field Inspection Report (Doc #708200035).

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	TRASH		
Comment:	Trash observed on location. Refer to attached inspection photos for documentation.		
Corrective Action:	Comply with Rule 606 and remove trash from location.		Date: <u>05/05/2023</u>
Type	OTHER		
Comment:	Trailer/equipment leaking with unknown fluid (w/chemical odor) and stained soil. Refer to attached inspection photos for documentation.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e.		Date: <u>04/29/2023</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Location Construction

Location ID: 483817 CDP: _____

Comment: It appears the previous corrective actions have been performed. During this inspection, Staff observed that a location sign was installed at the entrance off of the county road and an approved copy of the Form 2A was posted at the location, in compliance with both Rule 406.c and 406.d.

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: _____

Corrective Action: _____ Date: _____

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:

Inspected Facilities									
Facility ID:	<u>483817</u>	Type:	<u>LOCATION</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>CI</u>	
Facility ID:	<u>483939</u>	Type:	<u>WELL</u>	API Number:	<u>121-11100</u>	Status:	<u>DG</u>	Insp. Status:	<u>CI</u>

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 _____ Pass _____

Comment Four strand fencing around the entire perimeter of the location.

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____ Fail _____

Comment Appears topsoil from the production pad was salvaged and stored along the eastern and southern perimeters of the location. However, at the time of this inspection staff observed that the western portion of the location had two parking areas where topsoil salvage did not appear to have been performed. Refer to attached inspection photos for documentation.

Corrective Action _____

Comply with Rule 1002.b for soil removal and segregation. Corrective action date is the date the location was observed out of compliance.

Date 04/20/2023

1002c. PROTECTION OF SOILS _____ Pass _____

Comment Topsoil has been straw crimped with mulch and seeded to stabilize the stockpile to ensure compliance under Rule 1002.c.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment This 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). Field data was collected on April 20, 2023, using OnX mapping software, and indicates that the construction activities exceed the permitted disturbance area. It appears the disturbance encompassed approximately 4.64 acres, exceeding the permitted surface disturbance of 2.57 acres by approximately 80%. Additional disturbance was observed on the outside/exterior of the perimeter fencing and was not included in Staff estimates as data was collected from the interior fenceline, suggesting additional disturbance over the 4.64 acres. Refer to attached inspection photos for additional documentation.

Corrective Action _____

Comply with Rules 1002.e, 303.a(2), and 304.a(2). Corrective action date is the date the location was observed out of compliance.

Date 04/20/2023

1003a. Waste and Debris removed? _____

Comment See "Good Housekeeping" section comments.

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? _____ 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? _____

Comment Operator shall comply with interim reclamation timing requirements.

Corrective Action _____ Date _____

Overall Interim Reclamation

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: This location does not comply with Rule 1002.f. It does not appear that perimeter stormwater control BMPs have been constructed around the entire location. Of the ditch and berm BMPs identified, they do not appear to be designed adequately enough to manage stormwater run-on or run-off for a location of this size. More robust stormwater BMPs will need to be implemented to come into compliance with Rule 1002.f. Refer to attached inspection photos for documentation.</p> <p>Corrective Action: Immediately install or repair required BMPs per Rule 1002.f in accordance with good engineering practices. Corrective action date is the date the location was observed out of compliance, as the location should be in compliance at all times.</p> <p>Date: 04/20/2023</p>						
<p>Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT</p>						

COGCC Comments

Comment	User	Date
Provide explanation of mobile offices/trailers that are being stored on location and submit those details within FIRR.	edwardsond	04/27/2023

Attached Documents

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

Document Num	Description	URL
708200197	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6096389