

**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 FORM**Loc 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
GREGG, JESSICA		jessica.gregg@carbonameric a.com	
BECKER, JEFF		jeff.baker@carbonamerica.co m	

**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).

**Location**Overall 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: ☐

<b>Spills:</b>				
Type	Area	Volume		

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 SEGREGATION \_\_\_\_\_ 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 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? \_\_\_\_\_

Comment

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><b>Comment:</b> 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><b>Date:</b> 04/20/2023</p>
<p><b>Corrective Action:</b> 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><b>Pits:</b> <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
403387281	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6096396">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6096396</a>
708200197	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6096389">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6096389</a>