

**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:

11/06/2023

Submitted Date:

11/08/2023

Document Number:

696205410

**FIELD INSPECTION FORM**Loc ID 324169 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

OGCC Operator Number: 10163

Name of Operator: NONSUCH NATURAL GAS INC

Address: P O BOX 110066

City: NAPLES State: FL Zip: 34108

**Status Summary:**

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

**Findings:**

9 Number of Comments

6 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
		alex.fischer@state.co.us	
		john.heil@state.co.us	
Schroeder, Siera		siera.schroeder@state.co.us	
		dlee@nngus.com	
		dlee@nng.us.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
261024	WELL	PR	08/17/2001	GW	045-07928	CSOC 697-22 1	RI
292475	PIT	AC			-	CSOC 697-22 1	RI
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	RI

**General Comment:**

On 11/6/2023, 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:

#696201613 dated 8/4/2020;  
#696201798 dated 9/16/2020;  
#696201986 dated 11/2/2020;  
#701101602 dated 6/14/2021;  
#696202914 dated 7/12/2021;  
#696203083 dated 8/23/2021;  
#696203322 dated 11/1/2021;  
#696203530 dated 3/28/2022;  
#696204028 dated 8/30/2022;  
#696204551 dated 12/27/2022;  
#696205106 dated 7/14/2023;  
#696205148 dated 8/4/2023;  
and #696205251 dated 9/19/2023 to document compliance with the following corrective actions:

- Stormwater
- Interim Reclamation
- Noxious Weeds
- Wildlife Protection Devices at containers
- Inadequate BMPs to restrict access by unauthorized persons, livestock and wildlife to the Pit

This inspection is also a followup to NOAV #403104457.

It was observed in this inspection that the Location remains out of compliance with ECMC Rules, inspection and NOAV corrective actions; any attempt made by the Operator to comply with Rules and Corrective Actions are inadequate.

Any corrective action(s) from previous inspections that have not been addressed are still applicable. The "Date of Discovery" is being provided as the corrective action date for all new observed compliance issues. Location will remain out of compliance until corrective action(s) has(have) been resolved. A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**Overall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	<p>Previous inspections observed noxious weeds on the Location. Inspections required Operator to comply with Rules 1003.f and 606.c, and to perform ongoing weed monitoring and management.</p> <p>It was observed in this inspection that ongoing weed management has been inadequate; noxious weeds observed in the previous inspection(s) throughout the Location and interm areas (houndstongue) have matured and produced seed. Unable to find evidence that work to address weed issues on the Location have been performed.</p> <p>Corrective action and date remains applicable</p>		
Corrective Action:	Comply with Rule 1003.f and Rule 606.c, and conduct weed management. Ongoing weed monitoring/management is required until Location receives a passing final reclamation inspection		Date: <u>07/20/2021</u>

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type:	#		corrective date
Comment:	<p>Previous inspection observed that wildlife protection devices to prevent wildlife access were missing from the secondary containment BMPs of the methanol tanks adjacent to the well head and separator equipment. Inspection required Operator to install or repair wildlife protection equipment.</p> <p>It was observed in this inspection that wildlife protection BMPs (netting) has been implemented at the methanol tank next to the well. However, wildlife protection BMP (netting) at the methanol tank next to the separator equipment remains in disrepair.</p> <p>Corrective action has not been completed; original CA and CA date remains applicable.</p>		
Corrective Action:	Install or repair wildlife protection equipment.		Date: <u>11/06/2023</u>

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>261024</u>	Type:	<u>WELL</u>	API Number:	<u>045-07928</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>292475</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>324169</u>	Type:	<u>LOCATION</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 \_\_\_\_\_

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? \_\_\_\_\_ Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured \_\_\_\_\_ 80% Revegetation Fail

## 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 See "COGCC Comments" for Reclamation comments.

Corrective Action Comply with 1003 rules and conduct additional reclamation: Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Implement erosion controls to stabilize the seeded soils, and continue to monitor and manage this site until Final Reclamation has passed.

Date 10/31/2020

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: Previous inspections documented that BMPs to stabilize/protect, and manage runoff in a manner that minimizes erosion, degradation and sediment transport from the cut/fill slopes and access road of the Location were missing or insufficient. Inspections required Operator to comply with Rule 1002.f.

It was observed in this inspection that control measures remain missing or insufficient to stabilize, minimize erosion, manage runoff and prevent off-site sediment transport from the Location (cut/fill slopes and access road); erosion degradation has persisted.

Original corrective action and date remains applicable.

Corrective Action: **Comply with Rule 1002.f**

Date: 10/31/2020

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

Type: Lined: **YES** Pit ID: **292475** Lat: **39.514030** Long: **-108.200000**

Reference Point: Other: Length: Width:

**Lining:**

Liner Type: Liner Condition:

Comment: What appeared to be a large, circular patch was observed floating within the pit, suggesting a patch within the pit has become detached from the Liner.

See photo 6 in the attached document.

This issues is being forwarded to EPS.

Corrective Action

Date:

**Fencing:**

Fencing Type: **Netting/Fence com** Fencing Condition: **Inadequate**

Comment: Previous inspections observed that the fencing on the north end of the pit has broken, allowing livestock to enter the pit. Inspections required Operator to maintain fence to restrict access by unauthorized persons, livestock and wildlife to the Pit.

It was observed in this inspection that the perimeter fence at the pit has not been maintained.

The CA has not been addressed and remains applicable.

Corrective Action

Date: 07/14/2023

**Netting:**

Netting Type: **Fence/Net Combo** Netting Condition:

Comment: Previous inspections observed that the pit was uncovered, that the netting was stored along the perimeter of the pit, and that wildlife (birds) were observed entering the pit/fluids. Inspection required Operator to replace netting over the pit.

It was observed in this inspection that the netting has not been replaced, and the pit remains improperly covered to minimize impacts to wildlife.

This CA has not been addressed and remains applicable.

Corrective Action

Date: 07/14/2023

Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard:

Comment:				Date:
Corrective Action				
Permit:	Facility ID	Permit Num	Expiration Date	
	292475	400784065		
	418328	2607827		
	292475	400784065		
	292475	1433719		

**COGCC Comments**

Comment	User	Date
<p><b>RECLAMATION COMMENT</b></p> <p>Previous inspections documented that the interim areas of the Location are not progressing towards COGCC 1003 reclamation standards; Soils on interim areas predominantly bare and exposed; Soils appear to be subsoils; Topsoil does not appear to have been replaced.</p> <p>Inspections required Operator to conduct additional reclamation and ensure erosion controls are implemented to stabilize the seeded soils by 10/31/2020.</p> <p>In addition to inspection reclamation requirements, corrective actions per NOAV #403104457 also required the following by 8/12/2022:</p> <p>“Operator shall submit an interim reclamation plan, to be approved by COGCC (now ECMC) staff for the establishment of vegetation for disturbed areas no longer in use. The plan will include Operator’s approach to monitoring the growth and establishment of vegetation after reseeding and reporting to staff on a bi-annual basis the monitoring data until interim reclamation is complete. Upon completion of work, Operator shall submit documentation of work performed attached to a Field Inspection Report Resolution Form. Documentation shall include, at the least, invoices, the seed mixture provided by surface owner, and date stamped photographs of the reclamation in sufficiently high resolution so that details are readily discerned”.</p> <p>Unable to find evidence that additional reclamation was performed and control measures to stabilize the seeded soils installed per the corrective actions; Location remains mostly bare, or vegetated predominantly by Undesirable Plant Species; no reclamation plan has been submitted by Operator; No Resolution Form has been submitted by Operator to document that corrective action has been addressed, or to provide the required documentation.</p> <p>Location remains out of compliance with 1003 Rules, and NOAV requirements.</p>	trujilloam	11/08/2023

**Attached Documents**

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

Document Num	Description	URL
696205411	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315794">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315794</a>