

**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 FORMLoc 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.

LocationOverall 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: 07/20/2021 |

Overall Good: ☐**Spills:**

| | | | | |
|------|------|--------|--|--|
| Type | Area | Volume | | |
|------|------|--------|--|--|

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: 11/06/2023 |

Venting:

| | | |
|--------------------|--|-------|
| Yes/No | | |
| Comment: | | |
| Corrective Action: | | Date: |

Flaring:

| | | |
|--------------------|--|-------|
| Type | | |
| Comment: | | |
| Corrective Action: | | Date: |

| Inspected Facilities | | | | | | | | | |
|----------------------|--------|-------|----------|-------------|-----------|---------|----|---------------|----|
| Facility ID: | 261024 | Type: | WELL | API Number: | 045-07928 | Status: | PR | Insp. Status: | RI |
| Facility ID: | 292475 | Type: | PIT | API Number: | - | Status: | AC | Insp. Status: | RI |
| Facility ID: | 324169 | Type: | LOCATION | 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? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

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

Immediately maintain fence at pit to prevent unauthorized access to pit by people, livestock and wildlife.

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

Replace/Maintain netting over pit.

Date: 07/14/2023

Anchor Trench Present:

Oil Accumulation:

2+ feet Freeboard:

Comment:

| | | |
|-------------------|--|-------|
| Corrective Action | | Date: |
|-------------------|--|-------|

COGCC Comments

| Comment | User | Date |
|---|------------|------------|
| <p>RECLAMATION COMMENT</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 |
|--------------|----------------------|---|
| 403589645 | INSPECTION SUBMITTED | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315801 |
| 696205411 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6315794 |