

**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:

12/05/2023

Submitted Date:

12/06/2023

Document Number:

696205434

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:

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
		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			-	CSOC697-22-1 None	RI
324169	LOCATION	AC	04/14/2009		-	CSOC 697-22-66S97W 22NENE	RI

General Comment:

On 12/5/2023, 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;
#696205251 dated 9/19/2023;
and #696205410 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.

The following new compliance issues were observed during this inspection:

- Tank lacks plug/cap

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: ☐

Signs/Marker:			
Type	WELLHEAD		
Comment:			
Corrective Action:		Date:	
Type	TANK LABELS/PLACARDS		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment: 970-216-7767 / 239-289-9046 / 911

Corrective Action:

Date: _____

Good Housekeeping:

Type	OTHER		
Comment:	Cap/Plugs observed missing from the 300 bbl condensate tank		
Corrective Action:	replace cap/plugs at tank.	Date:	12/05/2023
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>This is a limited inspection due to snow cover, however ongoing weed management does not appear to have been performed, or has been inadequate; Undesirable and noxious weeds observed in the previous inspection(s) throughout the Location and interim areas (houndstongue, mullein) were evident above the snow, have matured and produced seed.</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?

Fencing/:			
Type			
Comment:			
Corrective Action:		Date:	

Equipment:			corrective date
Type:	#		

Comment:	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 by 11/7/2021.		
	It was observed in this inspection that the wildlife protection BMPs (netting) have been maintained at the two tanks. This CA has been addressed.		
Corrective Action:		Date:	

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
CONDENSATE	1	300 BBLS	STEEL AST		,
Comment:					
Corrective Action:					Date:

Paint

Condition					
Other (Content)					
Other (Capacity)					
Other (Type)					

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficient	Base Sufficient	Adequate
Comment:	Containment BMP appeared to be in proper functioning condition at time of inspection.			
Corrective Action:				Date:

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 REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ 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 **Fail**

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: [See "COGCC Comments" at the end of this report.](#)

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:

Corrective Action

Date:

Fencing:

Fencing Type: Netting/Fence com Fencing Condition:

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 by 7/14/2023.

It was observed in this inspection that the gate/fence has been repaired. This CA has been resolved.

Corrective Action

Date:

Netting:

Netting Type: Fence/Net Combo Netting Condition:

Comment:

Per Form 15 400784065, the pit is to be netted.

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:

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

COGCC Comments

Comment	User	Date
<p>STORWMATER COMMENT</p> <p>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.</p> <p>Limited inspection due to snow cover, however, unable to find evidence that stormwater and erosion control measures to stabilize, minimize erosion, manage runoff and prevent off-site sediment transport (cut/fill slopes and access road) were performed.</p> <p>Operator's email communication to staff indicated that that the access road will be reconstructed to redirect runoff, and that a water bar (berm) will be installed across the entrance to limit runoff from Trail Ridge Road; unable to find evidence that this work has been performed.</p> <p>No resolution has been submitted indicating corrective actions have been taken. Original CA and date will remain applicable.</p>	trujilloam	12/06/2023
<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. 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>This is a limited reclamation inspection due to snow cover, however, unable to find evidence that additional reclamation work was performed and control measures to stabilize the seeded soils installed per the corrective actions; areas of the Location that were observable remains predominantly bare.</p> <p>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	12/06/2023

Attached Documents

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

Document Num	Description	URL
696205435	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347964