

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 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 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:**

- 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<br>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.

**Location**

Overall Good:

**Signs/Marker:**

|                    |                      |       |  |
|--------------------|----------------------|-------|--|
| Type               | WELLHEAD             |       |  |
| Comment:           |                      |       |  |
| Corrective Action: |                      | Date: |  |
| Type               | TANK LABELS/PLACARDS |       |  |
| Comment:           |                      |       |  |
| Corrective Action: |                      | Date: |  |

Emergency Contact Number:

Comment:

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:**

|       |   |  |                 |
|-------|---|--|-----------------|
| 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 by 11/7/2021.</p> <p>It was observed in this inspection that the wildlife protection BMPs (netting) have been maintained at the two tanks. This CA has been addressed.</p> |       |  |
| 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: 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 \_\_\_\_\_

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 \_\_\_\_\_ 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

Corrective Action  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.](#)

Comment: [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.](#)

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.](#)

Comment: [It was observed in this inspection that the netting has not been replaced, and the pit remains improperly covered to minimize impacts to wildlife.](#)

Comment: [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><b>STORWMATER COMMENT</b></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><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. 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:<br/>                     "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 | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347964">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6347964</a> |