

**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:

06/21/2024

Submitted Date:

07/01/2024

Document Number:

708201343**FIELD INSPECTION FORM**Loc ID 483817 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10790Name of Operator: DENOVA SEQUESTRATION LLCAddress: 5525 WEST 56TH AVENUE SUITE 200City: ARVADA State: CO Zip: 80002**Status Summary:**

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

**Findings:**10 Number of Comments6 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
SPREADBURY, CRAIG		craig.spreadbury@carbonamerica.com	
GREGG, JESSICA		jessica.gregg@carbonamerica.com	
Arthur, Denise		denise.arthur@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
483817	LOCATION	AC			-	Denova 1	RI
483939	WELL	DG	04/24/2023		121-11100	Denova 1	RI

**General Comment:**

This is an Interim Reclamation and Stormwater Inspection for Location ID (483817).

This is also a follow-up inspection to previous Field Inspection Report (doc #708200572).

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Emergency contact number at the location entrance sign is not legible from a distance.Corrective Action: Install sign to comply with Rule 605.h.Date: 07/31/2024**Good Housekeeping:**

Type	DEBRIS		
Comment:	<span style="color: blue;">Previous FIR (doc #708200572) documented trash and debris throughout the location and access road. Operator submitted FIRR (doc #403697780) stating that the corrective action was completed on 10/19/2023. During this inspection, staff did not observe any trash or debris on location.</span>		
Corrective Action:		Date:	
Type	STORAGE OF SUPL		
Comment:	<span style="color: blue;">At the time of this inspection, a small trailer with equipment was observed being stored on the northwest corner of the drilling pad. Refer to attached inspection photos.</span>		
Corrective Action:	<span style="color: red;">Comply with Rule 606 to remove any supplies or equipment from the location.</span>	Date:	<u>07/08/2024</u>
Type	WEEDS		
Comment:	<span style="color: blue;">Previous FIR (doc #708200572) documented undesirable vegetation (russian thistle and kochia) throughout the location and access roads. During this inspection, Staff did not observe any russian thistle or kochia while on location. The Operator shall continue to monitor and manage this location for undesirable vegetation.</span>		
Corrective Action:		Date:	

Overall Good: ☐

<b>Spills:</b>					
Type	Area	Volume			
Other	WELLHEAD				
Comment:	<span style="color: blue;">Stained soils observed around the wellhead area. Refer to attached inspection photos.</span>				
Corrective Action:	<span style="color: red;">Properly dispose of oily waste in accordance with Rule 905.e.</span>				Date: <u>07/15/2024</u>

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	483817	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	483939	Type:	WELL	API Number:	121-11100	Status:	DG	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

**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 \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002b. SOIL REMOVAL AND  
SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ In Process \_\_\_\_\_

Comment

Previous FIR (doc #708200572) documented significant weed cover on the topsoil stockpile and required (via corrective action) management of undesirable vegetation to prevent weed establishment on the stockpiled soils.

During this inspection, the topsoil stockpile had little evidence of weeds; desirable vegetation was observed throughout the stockpile (e.g. western wheatgrass, prairie sandreed, yucca, sand sage, etc). However, there was also a large establishment of smooth brome, an introduced species, that was identified throughout the stockpiled topsoil. ECMC is requesting documentation of the seed mix and consultation with surface owner/local soil conservation district.

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.

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. (Original Corrective Action Date: 04/20/2023)

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? FailProduction areas stabilized ? Fail1003c. Compacted areas have been cross ripped? Fail

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? FailProduction areas have been stabilized? FailSegregated soils have been replaced? Fail**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_

Recontoured \_\_\_\_\_

Perennial forage re-established \_\_\_\_\_

Non-CroplandTop soil replaced FailRecontoured Fail80% 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? \_\_\_\_\_

Comment

This location does not comply with Rule 1003. Operator has failed to perform interim reclamation to reduce disturbance areas only reasonably needed for production operations. Well API #121-11100 was spud 04/24/2023, interim reclamation activities should have been completed by 10/24/2023. The Operator submitted a Form 4 Sundry Notice (doc #403697211) stating that interim reclamation will commence approximately 05/15/2024. This location is approximately 8 months out of compliance with Rule 1003. Refer to attached inspection photos for documentation.

Corrective Action

Perform reclamation in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

Date \_\_\_\_\_

Overall Interim Reclamation Fail**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 ReclamationWell Release on Active LocationMulti-Well Location

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment:

This location does not comply with Rule 1002.f. FIR (doc #708200572) documented that the location and access road were experiencing various stages of erosion degradation and inadequate stormwater control measures. At the time of this inspection, it does not appear that the Operator has repaired or stabilized any erosion degradation or implemented additional control measures that would prevent further site degradation. This location requires immediate maintenance/repairs of stormwater control measures in order to comply with Rule 1002.f. Refer to attached inspection photos for examples.

Corrective Action:

Comply with Rule 1002.f. The previous corrective action date from FIR (doc #708200572) remains applicable. (Original Corrective Action date: 09/27/2023)

Date:

Pits: NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
708201380	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6608617">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6608617</a>