

**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: _____

Status Summary:

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

Operator Information:

ECMC Operator Number: 10790
Name of Operator: DENOVA SEQUESTRATION LLC
Address: 5525 WEST 56TH AVENUE SUITE 200
City: ARVADA State: CO Zip: 80002

Findings:

- 10 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
GREGG, JESSICA		jessica.gregg@carbonameric a.com	
Arthur, Denise		denise.arthur@state.co.us	
SPREADBURY, CRAIG		craig.spreadbury@carboname rica.com	

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:	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.		
Corrective Action:		Date:	
Type	WEEDS		
Comment:	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.		
Corrective Action:		Date:	
Type	STORAGE OF SUPL		
Comment:	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.		
Corrective Action:	Comply with Rule 606 to remove any supplies or equipment from the location.	Date:	<u>07/08/2024</u>

Overall Good:

Spills:			
Type	Area	Volume	
Other	WELLHEAD		
Comment:	Stained soils observed around the wellhead area. Refer to attached inspection photos.		
Corrective Action:	Properly dispose of oily waste in accordance with Rule 905.e.		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? Fail Production areas stabilized ? Fail

1003c. 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? Fail

Production areas have been stabilized? Fail Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATION

Cropland

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

Non-Cropland

Top soil replaced Fail Recontoured Fail 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? _____

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 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: 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
403842371	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6608634
708201380	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6608617