

State of Colorado
Energy & Carbon Management Commission



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Document Number:
403887583

Date Received:
08/13/2024

FIR RESOLUTION FORM

Overall Status:

CA Summary:

6 of 6 CAs from the FIR responded to on this Form

6 CA Completed
0 Factual Review Request

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

Contact Name and Telephone:
Name:
Phone: () Fax: ()
Email:

Additional Operator Contact:

Contact Name	Phone	Email
Mike Smith	(724) 591-0654	michael.smith@carbonamerica.com
Matt Hess	(303) 725-2859	matt.hess@carbonamerica.com

ECMC INSPECTION SUMMARY:

FIR Document Number: 708201343
Inspection Date: 06/21/2024 FIR Submit Date: 07/01/2024 FIR Status:

Inspected Operator Information:

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

LOCATION - Location ID: 483817

Location Name: Denova Number: 1 County:
Qtrqtr: SENE Sec: 28 Twp: 1N Range: 49W Meridian: 6
Latitude: 40.027439 Longitude: -102.851636

FACILITY - API Number: 05-121-00 Facility ID: 483817

Facility Name: Denova Number: 1
Qtrqtr: SENE Sec: 28 Twp: 1N Range: 49W Meridian: 6
Latitude: 40.027439 Longitude: -102.851636

CORRECTIVE ACTIONS:

1 CA# 196358

Corrective Action: Properly dispose of oily waste in accordance with Rule 905.e. Date: 07/15/2024

Response: CA COMPLETED Date of Completion: 07/22/2024

Operator Comment: Denova has removed and disposed of oily wastes in accordance with Rule 905.e (Photos 13 to 15 Denova Sequestration FIRR Photos).

ECMC Decision:

ECMC
Representative:

2 CA# 196359

Corrective Action: Comply with Rule 606 to remove any supplies or equipment from the location.

Date: 07/08/2024

Response: CA COMPLETED

Date of Completion: 07/22/2024

Operator Comment: In compliance with rule 606 Denova has moved the trailer, used for stormwater BMP maintenance, off the site onto the adjacent property owners land with their permission (Photo 1 Denova Sequestration FIRR Photos).

ECMC Decision:

ECMC
Representative:

3 CA# 196360

Corrective Action: Install sign to comply with Rule 605.h.

Date: 07/31/2024

Response: CA COMPLETED

Date of Completion: 07/22/2024

Operator Comment: In accordance with Rule 605 h. Denova has updated the size of the emergency contact number on the sign to ensure that it is visible from a distance.

ECMC Decision:

ECMC
Representative:

4 CA# 196361

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: _____

Response: CA COMPLETED

Date of Completion: 08/13/2024

Operator Comment: This compliance issue will be resolved by compliance with the ECMC Warning Letter #403852863 and resubmission of an updated Form 2A. Resubmission of form 2A will occur by 9/12/2024.

ECMC Decision:

ECMC
Representative:

5 CA# 196362

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: _____

Response: CA COMPLETED

Date of Completion: 08/13/2024

Operator Comment: Per rule 1003, all disturbed areas affected by drilling or subsequent operations, except areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable. The 2.57-acre pad size was necessary for the swab operation that Denova commenced on 4/19/2024. This subsequent drilling operation occurred within 12 months of the completion of the initial drilling operation. Currently Denova anticipates the 2.57-acre pad size will be needed for additional drilling and completion operations that will occur within the next 10 months. As a result, Denova is proposing reducing the working pad size to the production pad until the end of these operations. Additionally, the parking areas, shown in photo 49 of

Inspection Document # 708201343, will undergo additional reclamation later this year. Additional reclamation, seeding, and protection of seed via erosion control blankets will occur this fall when the soil temperatures are more favorable for germinating seed.

ECMC Decision: _____

ECMC
Representative:

6 CA# 196363

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: _____

Response: CA COMPLETED

Date of Completion: 07/22/2024

Operator
Comment:

The reclamation activities that occurred on location the week of July 22nd fixed the erosion degradation along the road and pad and installed new temporary BMPs (Photos 2 to 12 Denova Sequestration FIRR Images). Additional temporary BMPs will be installed as part of the second mobilization later this year. Stormwater BMPs will need to be maintained throughout the life of the project.

The future stormwater and site reclamation activities include:

- Clean out existing BMPs. Reshape drainage ditches, sediment basins, and swales where necessary. Prepare soils for seeding.
- Drill and broadcast seed in areas where vegetative cover is less than ECMC standards.
- Install erosion control blankets to protect newly seeded areas.
- Install rip rap check dams where necessary.
- Install additional rolled sediment control where necessary.

ECMC Decision: _____

ECMC
Representative:

OPERATOR COMMENT AND SUBMITTAL

Comment: As Part of the FIR the see mix used and a potential consultation with the land owner was requested. Denova has provided the seed mix used at the location in an attachment to this FIRR. There was no smooth brome included in the seed mix used at the site. Additionally, the seed mix used was approved by the CPW prior to use on site. Following ECMC's review of the seed mix, Denova is happy to facilitate a landowner consultation.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Matt Hess

Signed: _____

Title: Geoscience Comp Manager

Date: 8/13/2024 3:23:59 PM

ATTACHMENT LIST

View Attachments in Imaged Documents on ECMC website (<http://ecmcweblink.state.co.us/>) - Search by Document Number.

<u>Document Number</u>	<u>Description</u>
403888382	Denova Sequestration FIRR Photos
403888390	Denova Seed Mix

Total Attach: 2 Files