

FORM INSP
Rev 05/11

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



DE	ET	OE	ES
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Inspection Date:
11/04/2014

Document Number:
667500309

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>237432</u>	<u>317251</u>	<u>AXELSON, JOHN</u>	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	<u>95520</u>
Name of Operator:	<u>WESCO OPERATING INC</u>
Address:	<u>120 S DURBIN STREET</u>
City:	<u>CASPER</u> State: <u>WY</u> Zip: <u>82602</u>

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED
- INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Rob Young		rob.young@state.co.us	COGCC
Weinert, Dave	(307) 577-5329	davew@kirkwoodcompanies.com	
Kirkwood, Tom	(307) 472-4618	tomk@kirdwoodcompanies.com	

Compliance Summary:

QtrQtr: <u>NESE</u>		Sec: <u>27</u>		Twp: <u>3S</u>		Range: <u>51W</u>	
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/12/2014	673705376	IJ	IJ	SATISFACTORY			No
07/07/2014	673704664	IJ	SI	ACTION REQUIRED			No
07/29/2013	668601175	IJ	AC	SATISFACTORY			No
07/13/2012	663400607	IJ	AC	ACTION REQUIRED	P		No
04/19/2011	200308088	RT	AC	SATISFACTORY			No
07/14/2010	200262608	MI	AC	SATISFACTORY			No
07/06/2009	200214080	RT	AC	SATISFACTORY			No
04/16/2008	200130360	RT	AC	SATISFACTORY			No
05/10/2007	200111945	RT	AC	SATISFACTORY		Pass	No
04/10/2006	200089361	RT	AC	SATISFACTORY		Pass	No
06/20/2005	200073033	MI	SI	SATISFACTORY		Pass	No
06/16/2005	200073029	MI	SI	ACTION REQUIRED		Fail	Yes
02/10/2005	200066887	MI	SI	SATISFACTORY		Pass	No
11/15/2004	200062834	MI	SI	SATISFACTORY		Pass	No
10/25/2004	200062285	MI	SI	SATISFACTORY		Pass	No
08/10/2004	200058215	RT	TA	SATISFACTORY		Pass	No
07/16/2003	200041679	RT	AC	SATISFACTORY		Pass	No
05/15/2002	200027052	MI	AC	SATISFACTORY		Pass	No

Inspector Name: AXELSON, JOHN

08/09/2001	200018548	RT	AC	SATISFACTORY	Pass	No
06/22/2000	200008050	RT	AC	SATISFACTORY	Pass	No
04/09/1996	500159796	DG	AC		Fail	Yes

Inspector Comment:

Inspection performed to determine status of Remediation Project #7987 related to Spill Tracking #2145279. Remediation was conditionally approved for in-place treatment of oily waste surrounding tank battery. Conditions of approval required progress sampling every four (4) months and semi-annual status reports beginning with first report due no later than November 30, 2013. No progress reports have been submitted to COGCC. Oily waste is still in place at battery. It does not appear any routine maintenance has been performed to treat the material. In addition, a stockpile of treated material related to Remediation Project #7613 remains on location with no stormwater controls. Disturbed surface areas related to Rem #7613 and skim pit closure Rem #7611 (Facility ID #434226) have not been reclaimed. Due to the failure to comply with the COAs for Project #7987, immediately excavate all oily waste remaining in place at the battery. Collect a sufficient number of confirmation samples to verify removal of all oily waste. Properly dispose of all oily waste. Remit to COGCC sample location diagram, summary of results compared to Table 910-1 standards, soil disposal documentation and laboratory report by December 31, 2014. See additional corrective actions within.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
107544	PIT		09/23/1999		-	RUDNIK 43B-27	
117702	PIT	AC			-	RUDNIK 33-27	EI
150066	UIC DISPOSAL	CL	06/20/2005		-	RUDNIK 43B-27	CL
159125	UIC DISPOSAL	AC	03/24/2005		-	RUDNIK 43B-27	AC
237432	WELL	IJ	11/01/2006	DSPW	121-09933	RUDNIK 43B-27	EI

Equipment:

Location Inventory

Special Purpose Pits: _____ Drilling Pits: _____ Wells: _____ Production Pits: _____
 Condensate Tanks: _____ Water Tanks: _____ Separators: _____ Electric Motors: _____
 Gas or Diesel Mortors: _____ Cavity Pumps: _____ LACT Unit: _____ Pump Jacks: _____
 Electric Generators: _____ Gas Pipeline: _____ Oil Pipeline: _____ Water Pipeline: _____
 Gas Compressors: _____ VOC Combustor: _____ Oil Tanks: _____ Dehydrator Units: _____
 Multi-Well Pits: _____ Pigging Station: _____ Flare: _____ Fuel Tanks: _____

Location

Emergency Contact Number (S/A/V): _____ Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

Type	Area	Volume	Corrective action	CA Date
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Multiple Spills and Releases?

Facilities:

New Tank Tank ID: _____

Contents	#	Capacity	Type	SE GPS	
CRUDE OIL	1	300 BBLS	STEEL AST		
S/A/V:	Comment: No capacity indicated. Has NFPA labels for crude oil & produced water.				
Corrective Action:	Tank recently added next to existing battery. Properly label tank.			Corrective Date:	12/31/2014

Paint

Inspector Name: AXELSON, JOHN

Condition					
Other (Content)	_____				
Other (Capacity)	_____				
Other (Type)	_____				
Berms					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Earth					
Corrective Action				Corrective Date	
Comment					

Venting:	
Yes/No	Comment

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 237432

Site Preparation:

Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/AV: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:

S/AV: _____ **Comment:** _____

CA: _____ **Date:** _____

Wildlife BMPs:

S/AV: _____ **Comment:** _____

CA: _____ **Date:** _____

Stormwater:

Comment: _____

Staking:

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Facility

Facility ID: 117702 Type: PIT API Number: - Status: AC Insp. Status: EI

Facility ID: 237432 Type: WELL API Number: 121-09933 Status: IJ Insp. Status: EI

Environmental

Spills/Releases:

Type of Spill: OIL Description: _____ Estimated Spill Volume: _____

Comment: Oily waste related to Rem #7987 remains in place at battery. No indication of in-place treatment. Status reports required by Nov 30, 2013, April 31, 2014 and October 31, 2014 were not submitted. Provide disposal documentation, sample location diagram, summary table with confirmation results compared to Table 910-1 and laboratory report. COGCC will pursue enforcement action if all required documentation is not received by 12/31/14.

Corrective Action: Immediately excavate all oily waste at battery and properly dispose. Date: 12/31/2014
 Reportable: _____ GPS: Lat _____ Long _____
 Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well: _____ Lat _____ Long _____
 DWR Receipt Num: _____ Owner Name: _____ GPS: _____

Field Parameters: _____

Sample Location: _____

Waste Management:

Type	Management	Condition	Comment	GPS (Lat)	(Long)
Oily Soil	Land Treatment	Inadequate	Oily waste still in place within tank battery secondary containment.		

Emission Control Burner (ECB): _____
 Comment: _____
 Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Interim Reclamation:
 Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____
 Land Use: _____
 Comment: Surface reclamation related to Remediation Projects #7611 & 7613 has not been performed. Stockpile of treated material still on location. No reclamation work performed at former skim pit. Stockpile of treated material was reportedly to be used for backfill. Either properly store treated material or use in the reclamation process. Grade all disturbed areas and prep for reveg spring of 2015.

1003a. Debris removed? _____ CM _____ CA _____ CA Date _____
 Waste Material Onsite? _____ CM _____ CA _____ CA Date _____
 Unused or unneeded equipment onsite? _____ CM _____ CA _____ CA Date _____
 Pit, cellars, rat holes and other bores closed? _____ CM _____ CA _____ CA Date _____
 Guy line anchors removed? _____ CM _____ CA _____ CA Date _____
 Guy line anchors marked? _____ CM _____ CA _____ CA 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 _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation

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 _____

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

S/A/V: **ACTION REQUIRED**

Corrective Date: **12/31/2014**

Comment: **No reveg or stabilization of disturbed areas. Stockpile of treated material on location without any stormwater controls.**

CA: **Use treated material in reclamation process. Properly contain until it is used.**

Pits: NO SURFACE INDICATION OF PIT

Pit Type: Skimming/Settling Lined: _____ Pit ID: _____ Lat: _____ Long: _____

Lining:
 Liner Type: _____ Liner Condition: _____
 Comment: _____

Fencing:
 Fencing Type: _____ Fencing Condition: _____
 Comment: _____

Netting:
 Netting Type: _____ Netting Condition: _____
 Comment: _____

Anchor Trench Present: _____ Oil Accumulation: _____ 2+ feet Freeboard: _____

Pit (S/A/V): **ACTION** Comment: **Skim pit was properly closed Rem #7611. Surface area was not reclaimed.**

Corrective Action: **Grade contour former skim pit area and revegetate to match surrounding. Submit sundry Form 4 with pictures to show reclamation work after completion.** Date: **04/30/2015**

Pit Type: Produced Water Lined: NO Pit ID: _____ Lat: _____ Long: _____

Lining:
 Liner Type: _____ Liner Condition: _____
 Comment: _____

Fencing:
 Fencing Type: _____ Fencing Condition: _____
 Comment: **No Fence**

Netting:
 Netting Type: _____ Netting Condition: _____
 Comment: _____

Anchor Trench Present: _____ Oil Accumulation: _____ 2+ feet Freeboard: _____

Pit (S/A/V): **ACTION** Comment: **Pit does not appear to be in use. Produced water disposed via inj. If pit is no longer in use, it needs to be closed. Treated material can be used for fill after confirmation samples verify no remaining impacts.**

Corrective Action: **Submit Form 27 for prior approval to properly close pit.** Date: **12/31/2014**

Attached Documents

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

Document Num	Description	URL
667500310	Stockpile of treated waste material	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3486513
667500311	Stockpile of treated waste material	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3486514
667500312	Former skim pit area	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3486515
667500313	Material within tank battery - Rem #7987	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3486516
667500314	Tank added to location	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3486517

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)