

**FORM  
INSP**Rev  
X/15**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:

08/25/2017

Submitted Date:

09/12/2017

Document Number:

675103909**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 95620Name of Operator: WESTERN OPERATING COMPANYAddress: 1165 DELAWARE STREET #200City: DENVER State: CO Zip: 80204**Status Summary:**

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

**Findings:**10 Number of Comments4 Number of Corrective Actions

- ☒
- Corrective Action Response Requested

**Contact Information:**

Contact Name	Phone	Email	Comment
James, Steven D	(303) 893-2438	steve@westernoperating.com	<a href="#">All Inspections</a>
		dale@westernoperating.com	
Young, Rob		rob.young@state.co.us	
Leonard, Mike		mike.leonard@state.co.us	
Crumley, Tim	(970) 768-5659	tcrumley@comcast.net	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	RI

**General Comment:**

This is an interim reclamation and stormwater inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.

**Location**Overall Good: ☐

<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	Sign not posted at well. Western operating sign posted at adjacent battery, no emergency contact information listed for location.		
Corrective Action:	Install sign at well and comply with Rule 210.b.	Date:	10/12/2017

Emergency Contact Number:

Comment:

Corrective Action:  Date:

**Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	Equipment being stored on the west side of the pumping unit. This needs to be removed and properly stored. See Photo 4. What appears to be a barrel and pipe found on the east end of the location. This needs to be removed and properly stored or disposed. See Photo 5. Blue bucket found at well head. This needs to be removed and properly stored, or placed in secondary containment. See photo 3.		
Corrective Action:	Comply with Rule 603.f	Date:	10/12/2017

Overall Good: ☐

<b>Spills:</b>				
Type	Area	Volume		

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:	221086	Type:	WELL	API Number:	075-09212	Status:	PR	Insp. Status:	RI
Producing Well									
Comment:	PR, IR and SW inspection.								
Corrective Action:				Date:					

**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  
SEGREGATION \_\_\_\_\_

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 ? Fail

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 \_\_\_\_\_

## 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 Substantial and ongoing erosion concerns exist to the south and west of the produced water pit have degraded the adjacent lands and vegetation. Operator comments in Form 27 #401254702 sates "Salt kill area will be ripped, treated with soil ammendments if necessary, and seeded with drought resistant vegetation".

Corrective Action See "COGCC Comments" for corrective action.Date 11/15/2017Overall 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: Substantial and ongoing erosion concerns exist to the south and west of the produced water pit. Operator comments in the Form 27 #401254702 state disturbed areas will be filled/graded and reclamation activities conducted. Until more permanent stabilization controls have been implemented and reclamation activities conducted, temporary stabilization controls will need to be implemented and maintained.

Corrective Action: Properly select, install and maintain stormwater and sediment control BMPs in accordance to 1002.f and good engineering practices.

Date: 10/12/2017

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Type: Skimming/Settling Lined: NO Pit ID: Lat: Long:

Reference Point: Other: Length: Width:

**Lining:**

Liner Type: Liner Condition:

Comment: Inspection doc. #678200660 required operator to submit form 27 regarding the "Oil Skim Culvert" and for "erosion from the south and west produced water pit berms". Form 27 #401254702 submitted. Refer to document and remediation project #10266 for additional details.

Corrective Action

Date: c

**Fencing:**

Fencing Type: Fencing Condition:

Comment:

Corrective Action

Date:

**Netting:**

Netting Type: Netting Condition:

Comment:

Corrective Action

Date:

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

Comment:

Corrective Action

Date:

**COGCC Comments**

Comment	User	Date
Stormwater and sediment control BMPs need to be maintained until passing of final reclamation.	trujilloam	09/12/2017

**CORRECTIVE ACTION**

trujilloam

08/28/2017

In accordance to COAs per 27 doc. #401254702, provide a soil sampling and analysis plan for the salt kill area to confirm compliance with Table 910-1 standards to EPS Rob Young, and import clean topsoil as necessary to restore the original grade in the salt kill area. If soil sampling and analysis indicates areas do not meet 910-1 standards, perform remediation and maintain stabilization BMPs until standards are met, at which point revegetation activities shall be conducted. If areas meet 910-1 standards, reclaim the disturbed areas in accordance to COGCC reclamation standards; Re-grade disturbed areas and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or 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 reclamation has passed. Remediation and/or revegetation activities shall be conducted no later than 11/15/2017.

**Attached Documents**

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

Document Num	Description	URL
675103912	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249070">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249070</a>