

**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	All Inspections
Leonard, Mike		mike.leonard@state.co.us	
Crumley, Tim	(970) 768-5659	tcrumley@comcast.net	
Young, Rob		rob.young@state.co.us	
		dale@westernoperating.com	

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.](#)

LocationOverall Good: ☐

Signs/Marker:			
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: ☐

Spills:				
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 REVEGETATIONCropland

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 <input type="checkbox"/>	Multi-Well Location <input type="checkbox"/>
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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
<p>CORRECTIVE ACTION</p> <p>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.</p>	trujilloam	08/28/2017
Stormwater and sediment control BMPs need to be maintained until passing of final reclamation.	trujilloam	09/12/2017

Attached Documents

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

Document Num	Description	URL
401400751	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249078
675103912	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249070