

**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:

675103918**FIELD INSPECTION FORM**Loc ID 312291 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:**6 Number of Comments3 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		tcrumley@comcast.net	
		rob.young@state.co.us	
		steve@westernoperating.com	
		dale@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221078	WELL	IJ	01/01/2017	DSPW	075-09204	Propst 1	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.

Inspected Facilities									
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	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 ? _____
- 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 east, south and west of the produced water pit have degraded the adjacent lands and vegetation.

Corrective Action See "COGCC Comments" for corrective action.

Date **11/15/2017**

Overall 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. Until more permanent stabilization controls have been implemented and reclamation activities conducted, temporary stabilization controls will need to be implemented and maintained to prevent further degradation.

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

Reference Point: Other: Length: Width:

Lining:

Liner Type: Liner Condition:

Comment:

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: Substantial erosion from the east, south and west produced water pit berms has occurred, likely a result from produced water discharge.

Corrective Action

Date: 10/12/2017

Collect and test soil sample(s) from the bare area(s) below the pit location, and sample from a reference area, for comparative laboratory analysis of pH, EC and SAR. Report the results attached to a form 4 compared to the Table 910-1, and provide a map outlining sample locations to COGCC Reclamation specialist Aaron Trujillo by corrective action date of 10/12/2017

If sample from impacted area(s) is(are) greater than Table 910-1 standards, operator will submit a form 27 to EPS Rob Young (rob.young@state.co.us).

COGCC Comments

Comment	User	Date
<p>CORRECTIVE ACTION:</p> <p>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 1000 series reclamation rules and 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	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
401400752	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249079
675103919	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4249071