

**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:

02/26/2018

Submitted Date:

03/05/2018

Document Number:

682503171**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:6 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		tcrumley@comcast.net	
Arthur, Denise		denise.arthur@state.co.us	
		steve@westernoperating.com	
Young, Rob		rob.young@state.co.us	

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
256303	PIT	AC			-	PROPST B-2	RI

General Comment:

This is a follow-up interim reclamation and stormwater inspection to doc. #675103909, #682502714 and #682502925. Any corrective actions from previous inspections that have not been addressed are still applicable.

Inspected Facilities									
Facility ID:	221086	Type:	WELL	API Number:	075-09212	Status:	PR	Insp. Status:	RI
Producing Well									
Comment:	PR well, Interim Rec. and Stormwater inspection								
Corrective Action:								Date:	
Facility ID:	256303	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI

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? **Fail**
- Production areas have been stabilized? **Fail** 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

Inspection #675103909 dated 8/25/2017, #682502714 dated 10/18/2017 and #682502925 dated 12/07/2017 required operator to perform remediation/reclamation and stabilize areas downgrade of the produced water pit experiencing substantial and ongoing erosion by 11/15/2017. See Remediation project #10266, and supplemental form 27 #401414059 for additional information. Erosion degradation on location, and downgrade of the pit have not been stabilized or repaired. No remediation or reclamation activities appear to have been conducted, and no stabilization and stormwater BMPs have been installed or maintained per the corrective action. Original corrective action and corrective action date remains applicable.

Corrective Action

Perform remediation/reclamation and implement/maintain stabilization BMPs until 910-1 standards are met, at which point revegetation/reclamation activities shall be conducted 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 activities shall be conducted no later than 11/15/2017.

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: Inspection #675103909 dated 8/25/2017, #682502714 dated 10/18/2017 and #682502925 dated 12/07/2017 required operator to implement temporary stabilization and stormwater controls until more permanent stabilization controls have been implemented and reclamation activities have been conducted. Erosion degradation throughout the location has not been repaired and no BMPs have been implemented and/or maintained. Original CA and CA date remains in place and applicable. This is the fourth inspection requiring stormwater management.

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 PITType: Skimming/Settling

Lined: _____

Pit ID: _____

Lat: _____

Long: _____

Reference Point: _____

Other: _____

Length: _____

Width: _____

Lining:

Liner Type: _____

Liner Condition: _____

Comment: Oil skim culvert (tinhorn) still on location. Remediation project #10266 indicated it would be removed. This is being referred to environmental.

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>Operator states in Form 27 #401254702 (dated 7/10/2017, remediation project #10266) that "tinhorn /oil skim culvert will be removed, as well impacted soils. Confirmation samples will be taken from each side-wall and from the bottom of the pit, and analyzed for BTEX, TPH, pH, SAR, and EC. Rilling at the PW pit berm will be filled in and graded, and then a ditch and berm system will be installed to prevent runoff from entering the pit. Salt kill area will be ripped, treated with soil ammendment if necessary, and seeded with salt resistant vegetation".</p> <p>Operator submitted supplemental Form 27 #401414059 on 10/04/2017 indicating sampling will be conducted, what remediation/reclamation steps will be taken, and what BMPs will be implemented to prevent further erosion. Operator indicated date for remedial action and reclamation was 10/15/2017.</p> <p>Work required per corrective actions, and as indicated via sundries and the form 27 by the operator, does not appear to have been conducted.</p>	trujilloam	03/05/2018

Attached Documents

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

Document Num	Description	URL
401563426	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4393700
682503172	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4393698