

**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:

11/08/2018

Submitted Date:

11/09/2018

Document Number:

682504107**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:**5 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM  
PREVIOUS INSPECTIONS THAT HAVE NOT  
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
		steve@westernoperating.com	
		denise.arthur@state.co.us	
		tcrumley@comcast.net	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	RI
221078	WELL	IJ	01/01/2017	DSPW	075-09204	Propst 1	RI

**General Comment:**

This is a follow-up interim reclamation and stormwater inspection to doc. #675103918 dated 8/25/2017, #682502716 dated 10/18/2017, #682502927 dated 12/07/2017, #682503173 dated 2/26/2018, #682503227 dated 4/10/2018, #682503672 dated 7/31/2018 and #682503989 dated 10/4/2018.

Any corrective actions from previous inspections that have not been addressed are still applicable.

Inspected Facilities									
Facility ID:	159442	Type:	UIC	API Number: -	Status:	AC	Insp. Status:	RI	
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	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? FailProduction 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? FailProduction areas have been stabilized? Fail

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

The previous seven (7) inspections 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 #10565. With exception to the gulley erosion on the west of the location, It appears that operator has re-graded and re-seeded the disturbed areas, however, Operator has failed to implement the REQUIRED stabilization and stormwater control BMPs. As a result, rill erosion degradation is recurring on the east end of the location. This corrective action will remain in place and applicable until it has been addressed in its entirety.

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/reclamation activities shall be conducted no later than 11/15/2017.

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
	Fail		Fail		Fail	

Comment: Previous inspections required operator to implement required stormwater and erosion control BMPs until more permanent stabilization controls have been implemented and reclamation activities have been conducted. Operator has failed to implement and maintain Best Management Practices (BMPs) on the location to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation and has continued to ignore requirements per COGCC rule 1002.f. This corrective action will remain applicable until it has been addressed.

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

Date: 10/12/2017

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

Permit:	Facility ID	Permit Num	Expiration Date
	256304	846026	

**COGCC Comments**

Comment	User	Date
It is noted that this is the 8th corrective action inspection since 08/25/2017 regarding reclamation and stormwater issues and concerns.	trujilloam	11/09/2018
Areas to the south of the pit appear to have been seeded up/down the slope rather than parallel to the contour. This may likely contribute to future erosion concerns as the furrows have created a straight path that will allow stormwater to concentrate and accelerate downslope.	trujilloam	11/09/2018

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

Document Num	Description	URL
682504109	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4640965">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4640965</a>