

**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:

682504105**FIELD INSPECTION FORM**

Loc ID Inspector Name: On-Site Inspection ☐
 312292 Trujillo, Aaron 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

**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE**

Contact Information:

Contact Name	Phone	Email	Comment
		tcrumley@comcast.net	
		denise.arthur@state.co.us	
		steve@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 a follow-up interim reclamation and stormwater inspection to doc. #675103909 dated 08/25/2017, #682502714 dated 10/18/2017, #682502925 dated 12/07/2017, #682503171 dated 02/26/2018, and #682503225 dated 04/10/2018, #682503670 dated 7/31/2018 and #682503985 dated 10/4/2018.

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:					

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

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 #10266, and supplemental form 27 #401414059 for additional information. 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. 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 11/15/2017

Overall Interim Reclamation

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. Previous inspections required operator to repair erosion degradation on access road and cattle guard at the access road gate. Operator has failed to implement and maintain Best Management Practices (BMPs) on the location/access road 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

COGCC Comments

Comment	User	Date
A trailer containing straw wattles/logs was observed on the north end of the location. Note that wattles/logs are sediment control BMPs intended to intercept, slow, or detain the flow of storm water to allow sediment to settle and be trapped.	trujilloam	11/09/2018
If installed in accordance with good engineering practices, wattles would likely address a portion of the stormwater corrective action requiring BMPs until more permanent stabilization controls have been implemented.		
However, reclamation corrective actions required erosion controls to stabilize the seeded soil.		
Wattles will not mitigate erosion degradation from occurring or provide stabilization to the seeded soil per the reclamation corrective actions.		
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

Attached Documents

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

Document Num	Description	URL
401834162	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4640967
682504106	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4640964