

**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:

05/06/2019

Submitted Date:

05/08/2019

Document Number:

696200002**FIELD INSPECTION FORM**
 Loc ID 319767 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
Gillette, Kira		kira.gillette@state.co.us	
,		dnr_cogccenforcement@state.co.us	
		dalehart@fairpoint.net	
		marta@westernoperating.com	
		steve@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
201303	WELL	PA	06/20/2017	OW	001-06706	DOWNING, RALPH 24-2	RI

General Comment:

This is a follow-up final reclamation and stormwater inspection. Any corrective action(s) from previous inspections that have not been addressed are still applicable.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	WEEDS		
Comment:	<p>Previous inspections required operator to comply with 603.f and remove weeds from battery location, and to continued to monitor and manage weeds until final reclamation has passed.</p> <p>Canada thistle (<i>Convolvus arvensis</i>) and Bindweed (<i>Convolvus arvensis</i>) remains evident throughout battery location. These are Colorado State listed noxious weeds. Additionally, vegetation on battery is predominantly undesirable weedy plant species. Operator has failed to conduct sufficient and ongoing weed management and monitoring per corrective actions. Original corrective action and date remains applicable.</p>		
Corrective Action:	Comply with rule 603.f and remove weeds. Continue to monitor and manage weeds until final reclamation of the location has passed.	Date:	06/19/2017

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
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 _____

Corrective Action _____ Date _____

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 **Fail** Contoured **Fail** Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control **Fail**

Non cropland: Revegetated 80% _____ Cropland: perennial forage _____

Weeds present **Fail** Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: [SEE "COGCC COMMENTS" FOR COMMENT REGARDING RECLAMATION](#)

Corrective Action: [SEE "COGCC COMMENTS" FOR CORRECTIVE ACTION REGARDING RECLAMATION](#) Date **06/20/2018**

Overall Final Reclamation **Fail** Well Release on Active Location ☐ Multi-Well Location ☐

COGCC Comments

Comment	User	Date
RECLAMATION CORRECTIVE ACTION Perform reclamation in accordance to COGCC 1000 series rules including, but not limited to, compaction alleviation, re-contouring, re-grading and revegetation of the access roads and well location, 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 Final Reclamation has passed. A corrective action date of 6/20/2018 is being provided as reclamation rule 1004.a requires that all reclamation work shall be completed within twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities	trujilloam	05/08/2019
RECLAMATION COMMENTS Previous inspections documented that the well was PAd 6/20/2017, and that the required COGCC 1000 series reclamation activities such as (but not limited to) compaction alleviation, re-contouring, regrading and revegetation of the access roads and location have not yet occurred, and that 1004.a requires that all reclamation work shall be completed within twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities; reclamation work shall be completed by 6/20/2018. This location does not meet reclamation requirements: Compaction alleviation and revegetation activities appear to have only been conducted in the immediate area of the well. Compaction alleviation does not appear to have been conducted on the access road and the remaining oil and gas location. Both the access road and the location have not been re-contoured or regraded to that of the adjacent lands in accordance to 1004.a. Erosion degradation evident on the northeast end of the pad, as well as the southern end of the pad. Reclamation work is required to be conducted in accordance with 1004.a on all disturbed areas of the oil and gas location and access roads. Original corrective action and date remains applicable.	trujilloam	05/08/2019

Attached Documents

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

Document Num	Description	URL
402036841	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4818361
696200004	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4818336