

**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:

11/25/2019

Submitted Date:

11/26/2019

Document Number:

696200865

FIELD INSPECTION FORMLoc ID 312291 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 1165 DELAWARE STREET #200

City: DENVER State: CO Zip: 80204

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

9 Number of Comments

3 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
		marta@westernoperating.com	
		dalehart@fairpoint.net	
		chris.binschus@state.co.us	
		denise.arthur@state.co.us	
		steve@westernoperating.com	
		dnr_cogccenforcement@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221078	WELL	IJ	08/01/2018	DSPW	075-09204	Propst 1	RI
312291	LOCATION	AC			-	PROPST-611N53W 26SWSW	RI

General Comment:

On 11/25/2019, Reclamation Specialist Trujillo conducted an interim reclamation and stormwater inspection at Western Operating's Propst #1 location in Logan County, Colorado.

This inspection is a follow-up to Field Inspection #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, #682503989 dated 10/4/2018, #682504107 dated 11/08/2018 and #682504519 dated 2/20/2019.

This is the 10th stormwater and reclamation inspection, and 9th follow-up inspection is to document compliance for the following corrective actions:

1002.f: Stormwater management

1003: Reclamation

It was documented that sufficient stormwater and erosion control BMPs have not been installed in accordance with good engineering practices or maintained in proper functioning condition; ongoing stormwater monitoring and management does not appear to be occurring; erosion degradation has continued on Location.

Vegetation establishment is not occurring and large portions of the slopes; impacted soils (salt kill) appear to continue being an issue hindering reclamation.

The following alleged compliance issues were observed during this inspection:

1002.f: Stormwater management

1003: Reclamation

Refer to the "Reclamation", "Stormwater" and "Good Housekeeping" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Portions of this inspection is being entered for notification and documentation only and is not intended to provide the Operator the potential opportunity to resolve the alleged violation(s) without the imposition of penalty, pursuant to Rule 522.c., therefore some of the corrective actions have no corrective action date. Operator is directed to perform corrective actions outlined on this inspection report immediately.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up on this site inspection will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	DEBRIS		
Comment:	It was observed that the straw wattles placed on slopes of the location were not installed or maintained in accordance with good engineering practices. Many wattles have been "blown out". Wattles and stakes are now considered debris.		
Corrective Action:	Remove and properly dispose of wattle debris. A corrective action date is not being applied as compliance with 1002 stormwater rules, including ensuring that BMPs remain in proper functioning condition, is expected at all times.		Date: 01/01/1111

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:

Inspected FacilitiesFacility ID: 221078 Type: WELL API Number: 075-09204 Status: IJ Insp. Status: RI**Producing Well**Comment: PR well, Interim Rec. and Stormwater Inspection

Corrective Action:

Date:

Facility ID: 312291 Type: LOCATION 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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment _____

Stormwater runoff has continued to transport sediment off Location, expanding the Location's disturbance on the adjacent lands.

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 ? 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 SEE "COGCC COMMENTS" FOR COMMENTS REGARDING RECLAMATION

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
Waddles	Fail					
	Fail					Stabilization BMPs

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER](#)Corrective Action: [Repair erosion degradation. 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
<p>RECLAMATION COMMENT</p> <p>The previous nine (9) inspections required operator to perform remediation/reclamation and stabilize areas downgrade of the produced water pit experiencing substantial and ongoing erosion substantially affecting adjacent lands by 11/15/2017. See Remediation project #10565, for additional information.</p> <p>Inspections dated 11/08/2018 and 2/20/2019 documented that, with exception to the gully erosion on the west end of the location (adjacent to anchor), Operator appeared to have re-graded and reseeded the disturbed areas, however, it was also observed that Operator failed to implement stabilization and stormwater control BMPs per the corrective actions and in accordance with 1002.f.</p> <p>It was observed in this inspection that stabilization controls have NOT been implemented per the corrective action and per 1002.f, and erosion degradation has continued on the Location and disturbance areas below pit.</p> <p>It was also observed that desirable vegetative germination HAS NOT occurred on large portions of the salt kill area. Remediation and reclamation efforts on the Location do not appear to be sufficient; Impacted soils likely remain resulting in reclamation failure. Operator has failed to sufficiently conduct the corrective actions, therefore additional remediation/reclamation efforts will be required and the original corrective action date will remain applicable.</p>	trujilloam	11/26/2019

STORMWATER COMMENT

trujilloam

11/26/2019

Previous inspections required Operator to comply with 1002.f, repair erosion degradation, and properly select, install and maintain required stormwater and sediment control BMPs on the Location.

Previous inspections also documented that straw wattles/erosion logs were placed around the perimeter of the pit and portions of the interim areas (salt kill) downgrade of the pit. BMPs were not installed in accordance with good engineering practices and were not in proper functioning condition. Inspections also documented that BMPs were insufficient, and erosion control/stabilization BMPs were not installed on the slopes. Inspections required Operator to comply with 1002.f and 1003 and install erosion control BMPs to stabilize the seeded soils post remediation/reclamation activities.

It was observed in this inspection that the straw wattles installed on Location were not reinstalled in accordance with good engineering practices and/or maintained in proper functioning condition; Sections of the wattles have been "blown out" and are now considered debris (see good housekeeping); Required BMPs to stabilize slopes of the Location have not been installed per 1002.f and corrective actions; additional sediment deposition due to sediment laden stormwater discharge on adjacent lands east and southwest of the location evident.

Operator has failed to conduct sufficient, ongoing stormwater management and monitoring pursuant to Rule 1002.f, and corrective actions. Original corrective action and date remains applicable.

Attached Documents

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

Document Num	Description	URL
696200866	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4999137