

**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 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:**9 Number of Comments3 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	
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		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.

**Location**Overall 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:

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 Facilities									
Facility 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 SEGREGATION \_\_\_\_\_

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? Fail
- Production 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 11/15/2017

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
	Fail					Stabilization BMPs
Waddles	Fail					

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**COGCC Comments**

Comment	User	Date
<p><a href="#">RECLAMATION COMMENT</a></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
402249557	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4999141">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4999141</a>
696200866	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4999137">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4999137</a>