

**FORM
INSP**Rev
X/20**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:

08/24/2022

Submitted Date:

08/30/2022

Document Number:

696105386

FIELD INSPECTION FORMLoc ID 312291 Inspector Name: Edwardson, Dylan 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:

8 Number of Comments

4 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
Trujillo, Aaron		aaron.trujillo@state.co.us	
		caitlin.stafford@coag.gov	
JAMES, STEVEN D	(303) 893-2438	steve@westernoperating.com	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221078	WELL	IJ	10/01/2020	DSPW	075-09204	Propst 1	RI
312291	LOCATION	AC			-	PROPST-611N53W 26SWSW	RI

General Comment:

On 08/24/2022, Reclamation Specialist Edwardson conducted an Interim Reclamation and Stormwater Inspection at PROPST-611N53W/26SWSW in Logan County, Colorado.

This inspection is also in response to NOAV (doc#402282191) to document compliance with the following corrective actions and abatement: Stormwater, Reclamation, and Remediation.

The following compliance issues were observed during this inspection:

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

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

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

A follow up inspection on this site 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:	During this inspection, it was observed that several straw wattles were improperly staked resulting in off site migration; this is considered debris.		
Corrective Action:	Comply with Rule 606 and remove any debris by corrective action date.		Date: <u>09/06/2022</u>

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
Facility ID:	312291	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI

Environmental**Spill/Remediation:****Comment:**

It was observed in this inspection that remediation and/or reclamation of the spill areas below the produced water pit are not progressing towards COGCC standards; desirable vegetative germination and establishment is not uniform; impacts due to spill remain apparent. See "Reclamation".

Additionally, stormwater management on the Location has been inadequate; erosion degradation from the pit berm has continued, resulting in additional off-site sediment transport and deposition. See "Stormwater"

F27 #402445093 (07/22/2020) states Operator conducted additional remediation and reclamation efforts (soil ripped 18", gypsum applied 2,500#/acres and tilled, mulch applied 2,000#/acre), areas reseeded b/w 11/1/2020 and 4/15/2021. F27 #402393447 (02/27/2020) indicates soil samples were collected and submitted, and that soil contamination was delineated. After reviewing the figures and documents attached, it has become apparent that sampling efforts are inadequate to effectively delineate horizontal and vertical impacts of the entire spill area; Operator only sampled from two points within the 0.6 acre spill area, with three samples taken at a depth of 0-6", 6-12", 12-18"; per sample.

Remediation of the spill areas have not been resolved; remediation is now subject to 900 Series Rules (effective 1/15/2021), including Table 915-1 concentration and cleanup standards.

Corrective Action:

Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination that is in excess of the cleanup concentrations in Table 915-1 for soil and groundwater- Operator shall collect an appropriate number of representative soil samples throughout the entire spill area to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B.

Operator shall also conduct sampling and analysis of soils at the perimeter berm of the produced water pit.

The Operator shall analyze samples for the complete Table 915-1 list and shall compare analytical results for site investigation samples to both the Table 915-1 Residential Soil Screening Level Concentrations and the Protection of Groundwater Soil Screening Level Concentrations.

Operator shall submit the comparative soil sample analysis to Table 915-1 attached to a supplemental Form 27, including map figures showing sample locations. Request Form 27 is routed to NE Reclamation Specialist Edwardson, and NW Reclamation Specialist Trujillo.

Date: 09/30/2022

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____

Wildlife Protection Devices (fired vessels): _____

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 [See "Good Housekeeping" section comments.](#)

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? Pass

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? Fail 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 REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced _____ Recontoured _____ 80% Revegetation Fail

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 This location does not comply with 1003 Rules. See "COGCC Comments" section for Reclamation comments.

Corrective Action Perform remediation/reclamation and implement/maintain stabilization BMPs until Table 915-1 standards are met, at which point revegetation/reclamation activities shall be conducted in accordance to COGCC reclamation standards; 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.

Date 11/15/2022

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

Comment:	This location does not comply with 1002.f Rules. See "COGCC Comments" section for Stormwater comments.		
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: 09/02/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256304	846026	
	256304	846026	

COGCC Comments

Comment	User	Date
Reclamation Comments: It appears that the Operator has performed remediation and reclamation activities on the affected Salt Kill areas. However, the attempts at reseeding have not resulted in sufficient vegetation cover as required by 1003 Rules. During this inspection, only sparse perennial vegetation (e.g. buffalo grass, blue grama) was observed on small portions of the location and the affected areas consisted of annual weedy vegetation, predominantly Kochia. Additionally, there were areas located immediately adjacent to the pit that are void of any vegetation, possibly a result of soils exceeding Table 915-1 standards that continue to persist and/or continued off site sediment transport not corrected by sufficient stormwater and erosion control BMPs. Some downslope areas affected by the salt kill have not revegetated and do not have sufficient stormwater BMPs to prevent further site degradation or erosion issues. Remediation and reclamation efforts on the Location do not appear to be sufficient; impacted soils likely remain resulting in reclamation failure. Refer to attached inspection photos.	edwardsond	08/26/2022
Stormwater Comments: 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. COGCC Staff observed that erosion control/stabilization BMPs were insufficient and that straw wattles have not been installed and maintained in accordance with good engineering practices resulting in further off site sediment transportation and degradation to adjacent lands. It appears the Operator has constructed a ditch and berm around the perimeter of the pit that is comprised of unconsolidated material placed on top of existing, failing, wattles causing further potential for offsite sediment transport. The majority of the wattles are inadequate and are either missing, buried, or installed incorrectly. Further, the pit walls are not stabilized as evidenced by rill/gully erosion issues on the west, south, and east walls. Stormwater management and erosion control BMPs do not appear to be sufficient for this location. Refer to attached inspection photos.	edwardsond	08/26/2022

Attached Documents

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

Document Num	Description	URL
696105389	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5843630