

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

05/15/2023

Submitted Date:

05/17/2023

Document Number:

690204212

## FIELD INSPECTION FORM

 Loc ID: 470757  
 Inspector Name: COSTA, RYAN  
 On-Site Inspection:   
 2A Doc Num:
**Status Summary:**

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

**Findings:**

- 8 Number of Comments
- 7 Number of Corrective Actions
- Corrective Action Response Requested

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

**Operator Information:**
 OGCC Operator Number: 95620  
 Name of Operator: WESTERN OPERATING COMPANY  
 Address: 1165 DELAWARE STREET #200  
 City: DENVER State: CO Zip: 80204
**Contact Information:**

Contact Name	Phone	Email	Comment
James, Steven D		steve@westernoperating.com	
COGCC Enforcement		dnr_cogccenforcement@state.co.us	
Hart, Dale		dale@westernoperating.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
470757	Location	AC			-	PYLES-619S45W 10SEW	RI

**General Comment:**

On 5/15/2023, Ryan Costa conducted a follow up inspection of the Pyles #4 Offsite tank battery location. The corrective actions of the previous reclamation inspection have not been completed. Non-compliance with the Rules will be referred to enforcement. See attached photos and additional details within this report.

**Location**

Overall Good:

**Signs/Marker:**

Type	BATTERY		
Comment:			
Corrective Action:		Date:	

Emergency Contact Number:

Comment:		Date:	
Corrective Action:		Date:	

**Good Housekeeping:**

Type	STORAGE OF SUPL		
Comment:	There is various unused unneeded equipment and supplies stored at the location. Some equipment appears to have been stored for a long duration of time and is not in use. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 1003.a. and 606 to remove unused unneeded equipment and supplies stored at the location.	Date:	04/07/2023
Type	OTHER		
Comment:	The shed inside the containment battery is not maintained and metal siding is laying on the ground. Previous corrective action has not been completed.		
Corrective Action:	Maintain in good mechanical condition per Rule 608.e	Date:	04/07/2023
Type	DEBRIS		
Comment:	There is various waste and debris on the location. Observed pile of broken concrete, broken tank bottom, bent rusty metal, weed trash debris ect. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 1003.a. and 606 to remove waste and debris	Date:	04/07/2023

Overall Good:

**Spills:**

Type	Area	Volume		
Crude Oil	Tank			
Comment:	There was a spill from the backside of the tank battery. There is also stained soil at the pipe outlet that needs to be cleaned up. Previous corrective action has not been completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date:	04/07/2023

In Containment: No

Comment:

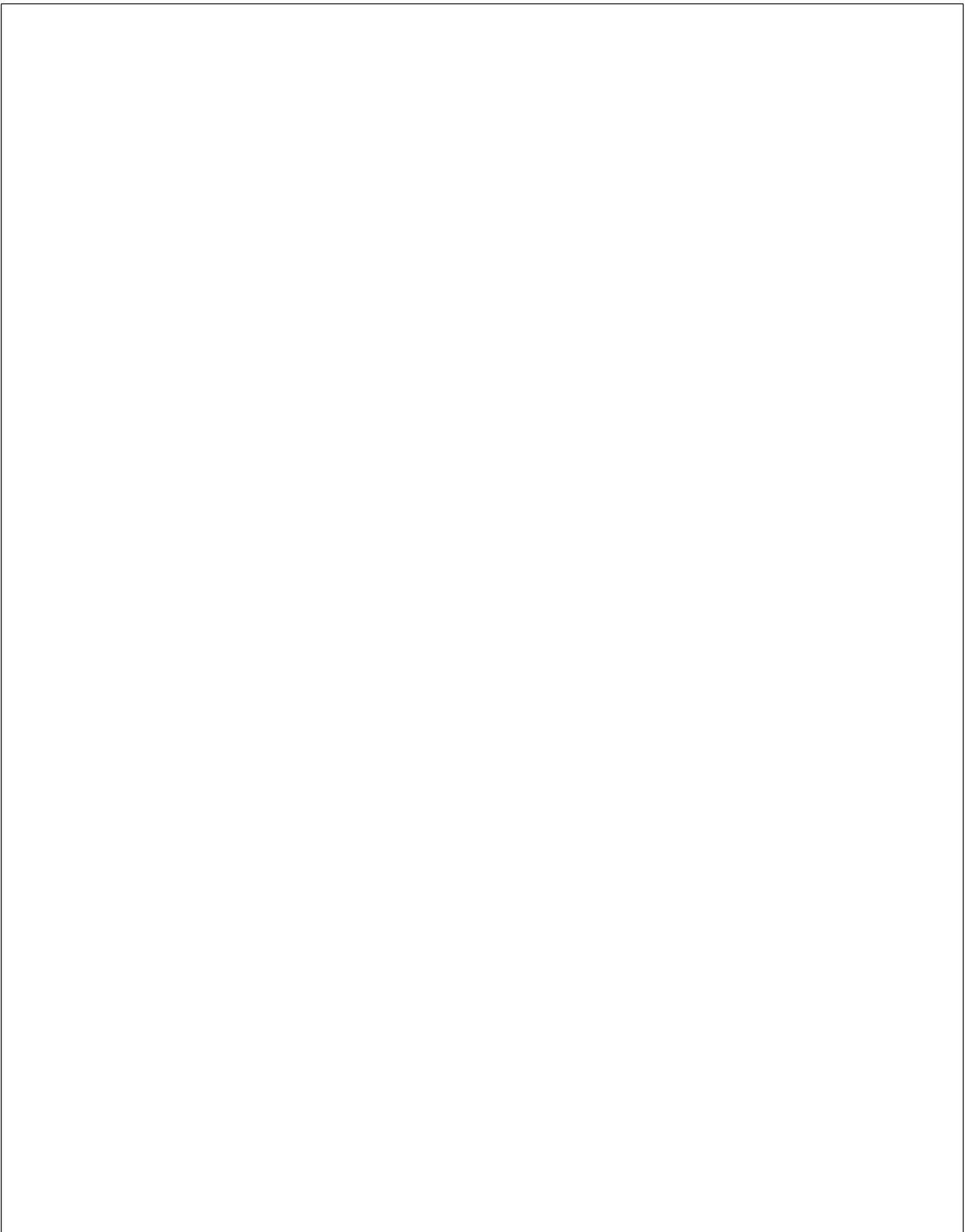
Multiple Spills and Releases?

**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 Fail

Comment Location is fenced however cattle tracks were observed inside the fenced area. Fence needs to be built and maintained to prevent livestock entry.

Corrective Action Comply with the fencing requirements per the 1002a rules Date 05/24/2023

1002b. SOIL REMOVAL AND SEGREGATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

1002E. SURFACE DISTRURBANCE MINIMIZATION Fail

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

1003a. Waste and Debris removed? Fail

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_ Date \_\_\_\_\_

Unused or unneeded equipment onsite? Fail

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? Fail Production areas stabilized ? \_\_\_\_\_  
 1003c. Compacted areas have been cross ripped? Fail  
 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? \_\_\_\_\_ 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 The tank battery location is being used as an unpermitted storage yard and was never reclaimed. The use of this location as a storage yard is prohibited per the rules. All unused equipment and supplies must be removed and interim reclamation must be performed. All disturbed areas affected by operations, except areas reasonably needed for production operations must be reclaimed per Rule 1003. Previous corrective action has not been completed.

Corrective Action Comply with 1003 Rules.

Date 04/15/2023

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 <input type="checkbox"/>
	Multi-Well Location <input type="checkbox"/>

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: The two buckets of oil were removed however stained soil was not cleaned up. There are barrels and containers not properly stored with secondary containment. Additionally storage is prohibited if not needed for this location and should be removed. Previous corrective action has not been completed.

Corrective Action: Implement or modify BMPs for improved material handling and spill prevention.

Date: 03/10/2023

**Pits:**     NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
403405824	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117167">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117167</a>
690204213	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117140">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117140</a>