

**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:

11/27/2023

Submitted Date:

11/30/2023

Document Number:

708200706**FIELD INSPECTION FORM**Loc ID: 312292 Inspector Name: Edwardson, Dylan 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:7 Number of Comments6 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
Arthur, Denise		denise.arthur@state.co.us	
Lindley, Trent		trent.lindley@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
JAMES, STEVEN D	(303) 893-2438	steve@westernoperating.com	
Heibel, Krystal		krystal.heibel@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	RI
312292	LOCATION	AC			-	PROPST-611N53W 27NESE	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and FIR (doc #708200627). This location has an associated AOC with Order NO. (1V-870).

Refer to Environmental Field Inspection Report (Doc #709100172) for additional information.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	UNUSED EQUIPMENT		
Comment:	Cattle panel on southern end of the pit is not installed.		
Corrective Action:	Comply with Rule 606 to remove unused equipment or reinstall. The location will remain out of compliance until the corrective action has been resolved.	Date:	11/27/2023
Type	STORAGE OF SUPL		
Comment:	Bulldozer appears to have been stored on location since the previous inspection (doc no 708200627; 10/16/2023). See previous inspection photos (doc no 708200639) Photo 4.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	11/27/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type: Other	#		corrective date
Comment:	No wildlife exclusion device (e.g. netting) observed around day tank secondary containment at the wellhead.		
Corrective Action:	Install or repair wildlife protection equipment per Rule 902.b. The location will remain out of compliance until the corrective action has been resolved.	Date:	11/27/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	221086	Type:	WELL	API Number:	075-09212	Status:	PR	Insp. Status:	RI
Facility ID:	312292	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

Previous Comment:
It was observed that vehicle traffic is occurring outside of the established access roads, north of this location. The Operator was previously notified of this issue in FIR (doc #696105387; 08/24/2022). Any new disturbances resulting from off location travel will need to be reclaimed per the 1000 Series Rules.

11/27/2023 Comment: The operator has not submitted any FIRR, and it is not apparent any steps have been taken to limit off location travel.

Corrective Action

Operator shall abide by the reclamation rules to minimize surface disturbances per Rule 1002.e. Inform any contractors and personnel about restrictive off site travel. Corrective Action date is the date the location was observed out of compliance.

Date **10/16/2023**

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? FailProduction 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? _____ 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 This location does not comply with Rule 1003. It does not appear any additional reclamation activities have been performed since the previous inspection(s), and the Operator has not submitted any FIRR in response to this compliance issue. Revegetation efforts of impacted/salt kill areas do not appear to be progressing towards Rule 1003 regulations and standards. It was observed that the salt kill area is comprised of non-uniform vegetation cover resulting in bare/exposed soils. Additional reclamation activities are required for this location.

Corrective Action Comply with Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of 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 the location meets Rule 1003 standards.

Date _____

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 Rule 1002.f. It does not appear the Operator has repaired any existing erosion degradation or installed/implemented additional stormwater control measures/BMPs that would prevent further site degradation. It was evident that no additional stormwater management activities have been performed since the previous inspection. The location continues to exhibit erosion degradation from unstabilized soils, improperly installed control measures/BMPs, and the lack of maintenance for the location. Refer to attached inspection photos for additional information.

Corrective Action: Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices and repair erosion degradation.

Date: _____

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
403611224	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6339367
708200715	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6339337