

**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:

12/20/2023

Submitted Date:

12/28/2023

Document Number:

709100197**FIELD INSPECTION FORM**Loc ID: 312291 Inspector Name: Heibel, Krystal 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:19 Number of Comments16 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
James, Steven	(303) 893-2438	steve@westernoperating.com	All Inspections
Krystal Heibel		krystal.heibel@state.co.us	
Kyle Waggoner		kyle.waggoner@state.co.us	
Dylan Edwardson		Dylan.edwardson@state.co.us	
Alex Fischer		Alex.fischer@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	EI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	Propst 1	EI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	EI

General Comment:

On December 20, 2023, ECMC Environmental Staff Krystal Heibel and Alex Fischer conducted an environmental field inspection of Western Operating Company (Western) Probst B #1 (Location ID: 312291).

This location has an associated AOC with Order No. (1V-870).

Weather was sunny, and temperature about 30 degrees Fahrenheit. For the most recent field inspection report of this facility, please refer to Document #709100174.

The following is a summary:

At the time of inspection, Pit Facility ID 256304 had fluid levels approx. 8 feet below top of berm. Visible hydrocarbons were observed around the perimeter of the pit.

During the time of the inspection, Caleb Haley and Brian Sulzberger (Ensolum) were on location.

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

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

LocationOverall Good: ☐**Signs/Marker:**

Type	OTHER		
Comment:	Vertical separator. A sign has been added, but the corrugated metal makes the sign illegible.		
Corrective Action:	Emergency Contact # illegible from a distance.	Date:	01/27/2023
Type	OTHER		
Comment:	300-bbl tank at pit facility ID 256304 not labeled or placard.		
Corrective Action:	Comply with Rule 605.e.g. and h.	Date:	01/27/2023
Type	WELLHEAD		
Comment:	No signage at wellhead.		
Corrective Action:	Comply with Rule 605.d.	Date:	01/29/2024
Type	BATTERY		
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e.	Date:	01/27/2023

Emergency Contact Number:

Comment:	Emergency Contact # illegible from a distance	
Corrective Action:	Comply with Rule 605.e. and g.	Date: 03/27/2023

Good Housekeeping:

Type	OTHER		
Comment:	Water within the pit was a shade of pink/red.		
Corrective Action:	Operator shall provide analytical results, sampling for full Table 437-1, Table 915-1, and Table 615.e.(2). (excluding the dissolved gasses and bacteria analysis) for the water within the pit. Water shall also be sampled for Rule 909.j.(1). If analytes are duplicated within the tables, there is no need to duplicate the sampling. Operator shall submit the analytics within the supplemental Form 27 submittal.		Date: 11/20/2023
Type	TRASH		
Comment:	Trash and debris throughout the location.		
Corrective Action:	Comply with Rule 606	Date:	12/12/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	WELLHEAD	<= 1 bbl		
Comment:	Hydrocarbon staining observed beneath the fence next to the injection well shed.			
Corrective Action:	Properly dispose of oily waste, in accordance with 905.e.			Date: 10/23/2023
Crude Oil	Tank	<= 1 bbl		
Comment:	Hydrocarbon staining observed beneath valve and on the north side of tank at its base. (This may be a potential leak.)			
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. Operator shall document integrity of the structure(tank) within 15 days.			Date: 08/23/2023
Crude Oil				
Comment:	Hydrocarbon staining observed within the pit. Refer to photo documentation.			

Corrective Action:	Properly dispose of oily waste in accordance with 905.e.	Date:	01/01/2024
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In Containment: Yes

Comment:

☒ Multiple Spills and Releases?

Equipment:			corrective date
Type: Other	# 1		
Comment:	Unmarked riser at tank battery.		
Corrective Action:	Maintain active and inactive flowlines and crude oil transfer lines to meet rule 1102.i.	Date:	08/10/2023
Type:	#		
Comment:	During the Aug 3, 2023, inspection, (Doc #709100064) impacted E&P waste was observed directly on the ground near the separator.		
Corrective Action:	Operator shall provide waste manifests for the E&P disposal within a supplemental Form 27 submittal.	Date:	11/20/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	1	300 BBLS	FIBERGLASS AST		40.893001,-103.264654	
Comment:	Tank not labeled or placard.					
Corrective Action:	Comply with Rule 605.e. and g.				Date:	01/27/2023

Paint

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:	Secondary containment is inadequate to contain 150% of the volume of the largest tank.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.				Date: 01/04/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>159442</u>	Type:	<u>UIC</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>	
Facility ID:	<u>221078</u>	Type:	<u>WELL</u>	API Number:	<u>075-09204</u>	Status:	<u>IJ</u>	Insp. Status:	<u>EI</u>
Facility ID:	<u>479472</u>	Type:	<u>TANK</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>EI</u>

Environmental			
Spills/Releases:			
Type of Spill: OIL		Estimated Spill Volume:	
Comment:		Oil staining at wellhead and filter (< 1 bbl). Filter socks appeared to be properly stored.Valves and fittings weeping oil at well head and tank battery.	
Corrective Action:		Control and contain spills/releases and clean up per Rule 912.a.	
		Date: 01/05/2023	
Reportable:		GPS: Lat	Long
Proximity to Surface Water:		Depth to Ground Water:	
Water Well Complaint:			
DWR Receipt Num:		Owner Name:	GPS : Lat Long
Field Parameters:			
Sample Location:		Comment:	

Reclamation - Storm Water - Pit**Storm Water:**

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

Comment: [See "Inspector/ECMC Comments" Section below.](#)

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

COGCC Comments

Comment	User	Date
Stormwater Comments: 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. BMPs not installed per good engineering practices (e.g. not trenched or properly staked) and is not adequate for stormwater management in its current application. Production areas previously experiencing stormwater erosion degradation do not appear to have been repaired or to have had implementation of more robust control measures installed. Stormwater control measures/BMPs remain inadequate for this location. Refer to attached inspection photos for additional documentation.	heibelk	12/28/2023

Attached Documents

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

Document Num	Description	URL
403638729	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6374644
709100198	photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6374631
709100200	photos 2	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6374633