

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:

01/03/2024

Submitted Date:

01/10/2024

Document Number:

708200849

## FIELD INSPECTION FORM

Loc ID 313654 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:**

- 11 Number of Comments  
10 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
Waggoner, Kyle		kyle.waggoner@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
101089	PIT	AC			-	SAND RIVER UNIT	RI
101090	PIT	AC			-	SAND RIVER UNIT	RI
101091	PIT	AC			-	SAND RIVER UNIT	RI
224744	WELL	PR	05/01/2019	OW	087-05129	PETERSON MAX 6	RI
313654	LOCATION	AC			-	PETERSON MAX-61N56W 27SEW	RI
477262	TANK BATTERY	AC	07/20/2020		-	WESTERN OPRTG CO TANK BATTERY	RI

**General Comment:**

This is an Interim Reclamation and Stormwater Inspection for Location ID (313654).

<b>Location</b>			
Overall Good: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	OTHER		
Comment:	NFPA placard at shed on north end of tank battery is not legible.		
Corrective Action:	Install sign to comply with Rule 605.g. The location will remain out of compliance until the corrective action is resolved.	Date:	<u>01/03/2024</u>
Emergency Contact Number:			
Comment:	<input style="width: 100%;" type="text"/>		
Corrective Action:	<input style="width: 100%;" type="text"/>		Date: _____
<b>Good Housekeeping:</b>			
Type	OTHER		
Comment:	Stained soil observed at wellhead and tank battery loadout lines.		
Corrective Action:	Properly dispose of oily waste in accordance with Rule 905.e. The location will remain out of compliance until the corrective action has been resolved.	Date:	<u>01/03/2024</u>
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (pumpjack ballasts) being stored at the well location.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	<u>01/03/2024</u>
Type	DEBRIS		
Comment:	Plastic debris observed south of tank battery location.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	<u>01/03/2024</u>
Overall Good: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
In Containment: No			
Comment:	<input style="width: 100%;" type="text"/>		
<input type="checkbox"/> Multiple Spills and Releases?			
<b>Equipment:</b>			
Type: Other	#		corrective date
Comment:	Day tank at well does not have adequate wildlife exclusion device (e.g. netting) around secondary containment.		
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:	<u>01/03/2024</u>
Type: Pump Jack	#		
Comment:	At the time of this inspection, Staff observed that the wellhead had a visible leak at the hammer union, causing staining around well bore. Staff emailed operator on 01/03/2024 to inform of leak and CA to fix equipment. The Operator (Steve James) emailed Staff on 01/04/2024 with photo documentation of repairs to equipment. The Operator is still required to document repairs/resolution to the corrective action with an FIRR submittal.		
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.  Provide photo documentation with FIRR submission.	Date:	<u>01/03/2024</u>
<b>Venting:</b>			

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type			
Comment:			
Corrective Action:		Date:	

**Inspected Facilities**

Facility ID: 101089 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 101090 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 101091 Type: PIT API Number: - Status: AC Insp. Status: RI

Facility ID: 224744 Type: WELL API Number: 087-05129 Status: PR Insp. Status: RI

Facility ID: 313654 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 477262 Type: TANK API Number: - Status: AC Insp. Status: RI

**Environmental**

**Spills/Releases:**

Type of Spill: \_\_\_\_\_ Estimated Spill Volume: \_\_\_\_\_

Comment: Evidence of a produced water spill/salt kill was observed west and down gradient of the former pits. Operator shall submit a Form 19 Initial to NE EPS (krystal.heibel@state.co.us). Refer to attached inspection photos for documentation.

Corrective Action: Operator shall provide an explanation of the liquids released and calculated volume on the Form 19 Initial Report. (CA date: 01/12/2024). In accordance with 913.d.(1) Operator will investigate impacts to soil, groundwater, and surface water as soon as the impacts are discovered. Per Rule 912.b.(3) Operator will submit a Supplemental Form 19 within 10 Days of spill discovery. (CA date: 01/19/2024)

Date: 01/19/2024

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**

**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 **It was observed that vehicle traffic is occurring outside of the established access roads south of the tank battery, possibly due to the access road being severely eroded. Refer to attached inspection photos for examples.**

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 **01/03/2024**

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 ? \_\_\_\_\_

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? \_\_\_\_\_

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 This location does not comply with Rule 1003. During this inspection, it was observed that interim areas have undesirable vegetation (e.g. russian thistle and kochia) around the tank battery and well location. Additionally, there is a suspected salt kill west and down gradient of the former pits that is evidenced by areas of bare/exposed soils (see also "Spill/Release" section for additional information). Refer to attached inspection photos.

Corrective Action Comply with Rule 1003. The location will remain out of compliance until the corrective action has been resolved. Date 01/03/2024

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: This location does not comply with Rule 1002.f. The access road to the south of the location, and the northwest corner of the pit, are experiencing severe erosion degradation (e.g. gullyng) with no apparent stormwater control measures to prevent further site degradation. Refer to attached inspection photos for documentation.

Corrective Action: Comply with Rule 1002.f. The location will remain out of compliance until the corrective action has been resolved.

Date: 01/03/2024

**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
708200870	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6388375">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6388375</a>