

**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:

01/10/2024

Submitted Date:

01/11/2024

Document Number:

713600593

FIELD INSPECTION FORMLoc ID 470757 Inspector Name: COSTA, RYAN 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:

10 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****Contact Information:**

Contact Name	Phone	Email	Comment
James, Steven	(303) 893-2438	steve@westernoperating.com	
Hart, Dale	719-688-1638	dale@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
484587	TANK BATTERY	AC	06/12/2023		-	Pyles 4 Tank Battery	RI

General Comment:

This is a follow up reclamation inspection and in regard to complaint #403484076.
The corrective actions of the previous reclamation inspections have not been completed.
Corrective actions will remain out of compliance until completed.

The date of discovery is given for all new corrective action dates. It is ECMC's expectation that Operators are in compliance with ECMC rules at all times. Therefore, No extended CA dates are applied and the corrective action will remain out of compliance until completed.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	DEBRIS		
Comment:	There is various waste and debris on the location which is a fire hazard. Observed tumble weed debris, plastic chemical containers, parts, trash ect. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 606 for Good Housekeeping and Rule 610 Fire Prevention and Protection.	Date:	04/07/2023
Type	OTHER		
Comment:	There was a reported fire incident that recently occurred at the heater treater. The treater has since fallen over and needs to be removed if it is no longer functional.		
Corrective Action:		Date:	
Type	STORAGE OF SUPL		
Comment:	There is various unused equipment and supplies stored at the location. Some equipment and supplies appear to have been stored for a long duration of time and are not in use for the tank battery facility. The various supplies are not stored in a workmanlike manner and are scattered on the ground. Some of the parts and supplies are rusty and bent and non functional. 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

Overall Good: ☐

Spills:				
Type	Area	Volume		
Crude Oil	Tank			
Comment:	There are stained soils at the tank battery loadout and along the berm of the containment (photo 4, 5). There are also oil stained soils at the heater treater that has fallen over.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.			Date: 01/10/2024

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	400 BBLS			,
Comment:					
Corrective Action:					Date:

Paint

Condition	<input type="text"/>
Other (Content)	<input type="text"/>
Other (Capacity)	<input type="text"/>
Other (Type)	<input type="text"/>

Berms						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Earth	Adequate	Walls Insufficient				
Comment:		The walls of the earthen berm have been rebuilt but the loose soil material must be compacted to be impermeable.				
Corrective Action:		Repair or install berms or other secondary containment devices per Rule 603.o.			Date:	01/10/2024
Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	2	300 BBLS			,	
Comment:		Shared berms				
Corrective Action:					Date:	
Paint						
Condition						
Other (Content)						
Other (Capacity)						
Other (Type)						
Berms						
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance		
Comment:						
Corrective Action:					Date:	
Venting:						
Yes/No						
Comment:						
Corrective Action:					Date:	
Flaring:						
Type						
Comment:						
Corrective Action:					Date:	

Inspected FacilitiesFacility ID: 484587 Type: TANK API Number: - Status: AC Insp. Status: RI**Complaint**Comment: This is a follow up in regard to complaint #403484076.

Complaint states unauthorized use of property as a pipe yard/ junk yard. Building falling down with insulation blowing into pasture. Fence that is in disrepair and cattle in the storage yard. See complaint for full details

It was observed that a storage yard was located at the active Pyles 4 Tank Battery location. There is unused equipment, pipe, and supplies that were not in use for operations of this tank battery location. There was plastic trash debris caught in the fence and other various debris that could blow offsite into the landowner's pasture. There was an area of the fence that was in disrepair where livestock could access the tank battery location and storage yard. These issues have been documented in previous inspections which have not been addressed by the operator.

Corrective Action: Provide documentation of Surface Use Agreement and County Permits associated with the storage yard. Access to records is required per Rule 206

Comply with Corrective Actions outlined within this inspection report.
Corrective actions will remain out of compliance until completed

Date: 08/09/2023

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

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION1002a. FENCING _____ **Fail**

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 _____

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? FailProduction areas stabilized ? Fail1003c. 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 REVEGETATIONCropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-CroplandTop soil replaced FailRecontoured Fail80% 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

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 RulesDate 04/15/2023Overall 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: There are oil stained soils that have 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. There is an erosion channel at the north side of the location which is transporting sediment offsite. Previous corrective actions have not been completed.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)
Implement or modify BMPs for improved material handling and spill prevention.
Conduct maintenance on equipment, cleanup stained material and review self inspection processes.

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
403652335	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390084
713600595	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390066