

**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:

01/24/2024

Submitted Date:

01/30/2024

Document Number:

709100204**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:22 Number of Comments19 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 D	(303) 893-2438	steve@westernoperating.com	
Kyle Waggoner		kyle.waggoner@state.co.us	
Dylan Edwardson		Dylan.edwardson@state.co.us	
Krystal Heibel		krystal.heibel@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 January 24, 2024, ECMC Environmental Staff Krystal Heibel, Alex Fischer, and Dylan Edwardson 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 #709100197.

For the Interim Reclamation and Stormwater Inspection conducted same day on Jan 24, 2024, reference FIR (Doc# 708200897).

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 and approx. 1/3rd of the pit fluid's contained a hydrocarbon sheen. At the time of inspection, fluids were being disposed of into the pit, a trash pump was observed positioned down the pit berm, and what appeared to be a fuel container was observed on its side.

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	TANK LABELS/PLACARDS		
Comment:	Tanks contain two different NFPA labels.		
Corrective Action:	Comply with Rule 605.h.	Date:	01/24/2024
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
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	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

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:	Gate around the pit was down during time of inspection.		
Corrective Action:	Comply with Rule 909.g.(4) and 1202.(4).A.	Date:	01/24/2024
Type	TRASH		
Comment:	Trash and debris throughout the location.		
Corrective Action:	Comply with Rule 606	Date:	12/12/2022
Type	WEEDS		
Comment:	Weeds (tumbleweeds) accumulated within the fence area of the pit, the heater treater, and vertical separator.		
Corrective Action:	Comply with Rule 606	Date:	01/24/2024
Type	OTHER		
Comment:	During the Dec 28, 2023, inspection, (Doc #709100197), 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

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					
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
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.) Hydrocarbon staining also observed near the loadout on the ground surface.					
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

In Containment: Yes

Comment:

☒ Multiple Spills and Releases?

Equipment:					
Type: Other	#				corrective date
Comment: No wildlife protection equipment (e.g. netting) installed at day tank secondary containment. During this inspection, Staff observed a wildlife mortality (unable to identify bird species) within apparent hydrocarbon fluid at the secondary containment. Refer to attached inspection photos.					
Corrective Action: Comply with Rule 902.b to install or repair wildlife protection equipment. The location will remain out of compliance until the corrective action has been resolved.				Date:	01/24/2024
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:	During the December and January field inspections, the pit berm was observed to have been pushed into the pit, exposing the area to wildlife and/or livestock access.				
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o. and comply with Rule 1202.(4).A..			Date:	01/24/2024

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: Refer to FIR, Doc# 708200897 for additional Interim Reclamation and Stormwater Inspection information.

Corrective Action:

Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256304	846026	

COGCC Comments

Comment	User	Date
Operator is in violation of Rule 913.e.(3) since a Site Investigation and Remediation Workplan (Form 27) has not been submitted to the ECMC for this facility within the last 90 days.	heibelk	01/30/2024

Attached Documents

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

Document Num	Description	URL
709100205	Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6412968