

**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:

03/20/2024

Submitted Date:

04/02/2024

Document Number:

708201015

**FIELD INSPECTION FORM**Loc ID 312291 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:**

8 Number of Comments

6 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 |
|-----------------|-------|----------------------------|---------|
| Heibel, Krystal |       | krystal.heibel@state.co.us |         |
| Fischer, Alex   |       | alex.fischer@state.co.us   |         |
| Elnajdi, Abdul  |       | abdul.elnajdi@state.co.us  |         |
| Lindley, Trent  |       | trent.lindley@state.co.us  |         |
| Ferrin, Jeremy  |       | jeremy.ferrin@state.co.us  |         |
| Arthur, Denise  |       | denise.arthur@state.co.us  |         |
| Binschus, Chris |       | chris.binschus@state.co.us |         |
| JAMES, STEVEN   |       | steve@westernoperating.com |         |
| Waggoner, Kyle  |       | kyle.waggoner@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                              | RI          |
| 221078      | WELL            | IJ     | 10/01/2020  | DSPW       | 075-09204 | PROPST 1                               | RI          |
| 312291      | LOCATION        | AC     |             |            | -         | PROPST-611N53W<br>26SWSW               | RI          |
| 479472      | TANK<br>BATTERY | AC     | 02/23/2021  |            | -         | PROPST Tank Battery<br>611N53W /26SWSW | RI          |

**General Comment:**

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312291) and FIR (doc #708200897 conducted on 01/24/2024). This location has an associated AOC with Order NO. (1V-870).

Refer to Environmental Field Inspection Report (Doc #709100243) for additional information.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: Overall Good: ☐**Spills:**

| Type | Area | Volume |  |  |
|------|------|--------|--|--|
|------|------|--------|--|--|

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

|                    |  |  |                  |
|--------------------|--|--|------------------|
| Type               | OTHER  |  |                  |
| Comment:           | It appears that the excavation is not properly fenced off to exclude wildlife, livestock and/or personnel; excavation was not attended by the operator at the time of this inspection. |  |                  |
| Corrective Action: | Comply with 913.b(5)B.i to fence or cover open excavations to prevent access when sites are not attended.  |  | Date: 04/09/2024 |

**Equipment:**

|                    |   |  |                 |
|--------------------|---|--|-----------------|
| Type:              | #   |  | corrective date |
| Comment:           | It appears that wildlife protection equipment (e.g netting) has been installed around the secondary containment at the injection well day tank. |  |                 |
| Corrective Action: |   |  | Date:           |

**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>RI</u>     |           |
| Facility ID:         | <u>221078</u> | Type: | <u>WELL</u>     | API Number:          | <u>075-09204</u> | Status:   | <u>IJ</u>     | Insp. Status: | <u>RI</u> |
| Facility ID:         | <u>312291</u> | Type: | <u>LOCATION</u> | API Number:          | <u>-</u>         | Status:   | <u>AC</u>     | Insp. Status: | <u>RI</u> |
| Facility ID:         | <u>479472</u> | Type: | <u>TANK</u>     | API Number:          | <u>-</u>         | Status:   | <u>AC</u>     | Insp. Status: | <u>RI</u> |

**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 Fail

Comment During this inspection, Staff observed that impacted material had been stockpiled and stored on top of undisturbed vegetation and soil, south of the previously identified salt kill areas. There was no evidence to suggest that topsoil had been separated and stored prior to stockpiling of the impacted materials, nor was there any indication (signage, etc.) of stored topsoil elsewhere on the location. Refer to attached inspection photos for additional information.

Corrective Action **Comply with Rule 1002.b.**

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS Fail

Comment During this inspection, Staff observed a new disturbance/excavation south of and west of pit (#256304) and throughout the previously identified salt kill areas, totalling approx. 0.75 acre in size with an estimated stockpile volume of 2500CY. Stockpiled soil appears to have been placed directly on top of undisturbed soil/vegetation (e.g. soils not impacted by salt kill) and no evidence of an impermeable liner was observed. Additionally, stockpiled soils do not appear to be properly stabilized as material has been left unconsolidated. Additional stabilization BMPs are required to prevent wind and water erosion degradation on the stockpiled soils and at the excavation sites. Refer to attached inspection photos.

Corrective Action **Comply with Rule 1002.c.**Date **04/09/2024**1002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment During this inspection, Staff observed new disturbances resulting from excavation of the salt kill area (approx. 0.75 acres) and stockpiled soils (approx. 2500CY) placed directly on top of undisturbed reference areas. Vehicle traffic also appears to be occurring outside of established access/lease roads. These disturbances have not been approved under ECMC rules and regulations. Refer to attached to inspection photos for additional.

Corrective Action **Comply with Rule 1002.e. (original CA date of 10/16/2023 when the location was first observed out of compliance).**Date **10/16/2023**

**Comply with Rule 304.a to submit a Form 2A (Oil and Gas Location Assessment) to ECMC to increase the existing Oil and Gas Location to include the new land disturbances (approx. 0.75 acres in size). The location will remain out of compliance until the corrective action has been resolved. Refer to Environmental Inspection (doc #709100243) for additional information.**

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? **Fail**

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? **Fail**

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. 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. At the time of this inspection, ECMC Staff observed that the impacted salt kill areas have been excavated and the impacted material/soil has been stockpiled on adjacent reference areas (e.g undisturbed). The Operator has not provided any documentation or communication to Staff explaining the excavations. All areas impacted by excavation activities will require additional reclamation. Refer to attached inspection photos.

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. At the time of this inspection, it does not appear that any additional stormwater control measures/BMPs have been implemented, or any existing erosion degradation has been stabilized and/or repaired. Impacted material has been stockpiled on adjacent undisturbed lands and has been left unconsolidated which can become a potential pollutant source as it is not properly stabilized. The location continues to exhibit erosion degradation from unstabilized soils, improperly installed control measures/BMPs, and the lack of maintenance/control measures 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   |
|--------------|----------------------|---|
| 403739581    | INSPECTION SUBMITTED | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491132">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491132</a> |
| 708201093    | Inspection Photos    | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491118">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491118</a> |