

**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:

05/02/2024

Submitted Date:

05/08/2024

Document Number:

708201239

FIELD INSPECTION FORM

Loc ID: 312291 Inspector Name: Edwardson, Dylan On-Site Inspection: 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
- FOLLOW UP INSPECTION REQUIRED
- NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

ECMC Operator Number: 95620
Name of Operator: WESTERN OPERATING COMPANY
Address: 1165 DELAWARE STREET #200
City: DENVER State: CO Zip: 80204

Findings:

- 10 Number of Comments
- 9 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
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	
Arthur, Denise		denise.arthur@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Lindley, Trent		trent.lindley@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 26SWSW	RI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312291) and FIR (doc #708201015 conducted on 03/20/2024).

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

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.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

OTHER

Comment: Free fluids observed within secondary containment at day tank. Refer to attached inspection photos.

Corrective Action: Properly dispose of oily waste in accordance with Rule 905.e.

Date: 05/23/2024

Overall Good:

Spills:

Type

Area

Volume

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type

Comment: Previous Comment from FIR (doc #708201015) "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."

It does not appear that the corrective action has been performed at the time of this inspection, no visible fencing was observed around the open excavation. Refer to attached inspection photos. Original corrective action date remains applicable.

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

Venting:

Yes/No

Comment:

Corrective Action:

Date:

Flaring:

Type

Comment:

Corrective Action:

Date:

Inspected Facilities

Facility ID: 159442 Type: UIC API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 221078 Type: WELL API Number: 075-09204 Status: IJ Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 312291 Type: LOCATION API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Facility ID: 479472 Type: TANK API Number: - Status: AC Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10 14 12

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: During this inspection, it was observed that oil staining within injection well shed does not appear to have been properly removed and disposed of as required by previous corrective actions. This was previously documented in Environmental FIR (doc #709100243); original corrective action date remains applicable. Refer to attached inspection photos.

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

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 Previous Comment from FIR (doc #708201015) "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."

It does not appear that the corrective action has been performed at the time of this inspection. Refer to attached inspection photos.

Corrective Action Comply with Rule 1002.b.

Date _____

1002c. PROTECTION OF SOILS Fail

Comment Previous Comment from FIR (doc #708201015) "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 It does not appear that the corrective action has been performed at the time of this inspection. Original corrective action date remains applicable.

Comply with Rule 1002.c.

Date 04/09/2024

1002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment Previous Comment from FIR (doc #708201015) "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."

It does not appear that the corrective action has been performed at the time of this inspection. Original corrective action date remains applicable. Refer to attached inspection photos.

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

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.

Date 10/16/2023

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, ECOM 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

Type: _____ Lined: _____ Pit ID: _____ Lat: _____ Long: _____
 Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:
 Liner Type: _____ Liner Condition: _____
 Comment: _____
 Corrective Action: _____ Date: _____

Fencing:
 Fencing Type: _____ Fencing Condition: _____
 Comment: _____
 Corrective Action: _____ Date: _____

Netting:
 Netting Type: _____ Netting Condition: _____

Comment:	The produced water pit does not have any netting/BMP to exclude entry by wildlife. Refer to attached inspection photos.	Date: <u>05/15/2024</u>
Corrective Action	Comply with Rule 1202.a(4)B.	
Anchor Trench Present:	Oil Accumulation:	2+ feet Freeboard:
Comment:		
Corrective Action	Date:	

Attached Documents

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

Document Num	Description	URL
403784413	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6541175
708201242	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6541172