

**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:

06/13/2024

Submitted Date:

06/24/2024

Document Number:

709100326

**FIELD INSPECTION FORM**Loc ID 312291 Inspector Name: Heibel, Krystal On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**

ECMC 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:**

14 Number of Comments

11 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
Abdul Alnajdi		abdul.elnajdi@state.co.us	
Alex Fischer		alex.fischer@state.co.us	
Krystal Heibel		krystal.heibel@state.co.us	
Dylan Edwardson		dylan.edwardson@state.co.us	
JAMES, STEVEN D	(303) 893-2438	steve@westernoperating.com	

**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 June 13, 2024, ECMC Environmental Staff Krystal Heibel, Alex Fischer, Dylan Edwardson, Abdul Elnajdi, and Kyle Waggoner 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 cloudy, windy, and temperature about 80 degrees Fahrenheit.

For the most recent field inspection report of this facility, please refer to Document #709100243.

The following is a summary: At the time of inspection, Pit Facility ID 256304 had fluid levels approx. 10 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 not being disposed of into the pit.

The excavation activity resulted in a stockpile to the south of the pit and an additional stockpile to the west of the pit. It appears that recent excavation has increased the footprint of the oil and gas facility's location.

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: <input type="checkbox"/>			
<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	No signage at wellhead		
Corrective Action:	Comply with Rule 605.d.		Date: 01/29/2024
Emergency Contact Number:			
Comment:	Emergency contact number removed from tank batteries		
Corrective Action:	Install sign to comply with Rule 605.h.		Date: 07/13/2024
<b>Good Housekeeping:</b>			
Type	OTHER		
Comment:	Additional stockpiles have been added to the south and the west of the location which increased the location's footprint.		
Corrective Action:	Operator shall submit an updated Form 2A (Oil and Gas Location Assessment) to the ECMC to increase the existing Oil and Gas Location, as required by Rule 304.		Date: 03/26/2024
Type	TRASH		
Comment:	Trash and debris throughout the location.		
Corrective Action:	Comply with Rule 606		Date: 12/12/2022
Type	OTHER		
Comment:	During the Dec 28, 2023, (Doc #709100197) and March 20, 2024 inspections, 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: <input type="checkbox"/>			
<b>Spills:</b>			
Type	Area	Volume	
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	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: 12/23/2023
Crude Oil	Tank	<= 1 bbl	
Comment:	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:			
<input checked="" type="checkbox"/> Multiple Spills and Releases?			
<b>Fencing/:</b>			
Type			

Comment:	It appears that the excavation is 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:			Date:	
<b>Equipment:</b>			corrective date	
Type: Other	#			
Comment:	During the March 20, 2024, inspection, (Doc #709100243), hydrocarbon staining was observed beneath valve and on the north side of tank at its base, indicating a potential leak.			
Corrective Action:	Operator shall document integrity of the structure(tank) within 15 days.		Date:	08/23/2023
Type: Other	#			
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
<b>Venting:</b>				
Yes/No				
Comment:				
Corrective Action:			Date:	
<b>Flaring:</b>				
Type				
Comment:				
Corrective Action:			Date:	



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# 708201332 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	
	256304	846026	

Attached Documents

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

Document Num	Description	URL
709100327	Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6599205">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6599205</a>
709100328	Pictures	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6599206">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6599206</a>