

**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:

09/30/2024

Submitted Date:

10/08/2024

Document Number:

708201667

**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Edwardson, Dylan 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:**

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	
JAMES, STEVEN		steve@westernoperating.com	
Fischer, Alex		alex.fischer@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
100311	PIT	AC			-	PROPST 2B	RI
221086	WELL	SI	05/01/2024	OW	075-09212	PROPST 2	RI
256303	PIT	AC			-	PROPST B-2	RI
312292	LOCATION	AC	05/09/2024		-	PROPST-611N53W 27NESE	RI

**General Comment:**

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and to the previous FIR (doc #708201456) conducted on 07/29/2024.

Refer to Environmental FIR (doc #709100421) conducted on 09/30/2024 for additional information.

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: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:				Date: _____
Corrective Action:				
Good Housekeeping:				
Type	UNUSED EQUIPMENT			
Comment:	Unused equipment (secondary containment) previously observed in FIR (doc #708201456) appears to have been removed.			
Corrective Action:				Date:
Type	WEEDS			
Comment:	Undesirable vegetation (kochia, russian thistle) was observed throughout the location including soil stockpiles and excavated areas. This was previously documented in FIR (doc #708201456) and does not appear to have been completed.			
Corrective Action:	Comply with Rule 606 and and manage undesirable vegetation. (Original CA Date: 08/13/2024).			Date: 08/13/2024
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment:				
<input type="checkbox"/> Multiple Spills and Releases?				
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date:
Flaring:				
Type				
Comment:				
Corrective Action:				Date:

Inspected Facilities									
Facility ID:	100311	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	221086	Type:	WELL	API Number:	075-09212	Status:	SI	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	256303	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	312292	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental			
<b>Spills/Releases:</b>			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:	<div>During this inspection, it was observed that sediment transport may have occurred on the drainage northwest of the pit/salt kill excavation. It appears that the berm may have been breached resulting in the deposition of stormwater and sediment into the drainage. As the stormwater originated from the pit/salt kill excavation, it is considered E&amp;P waste and as result, a reportable spill.</div>		
Corrective Action:	<div>Report spill or release of E&amp;P waste or produced fluids by submitting a Form 19. Remove free fluids and contact ECMC Remediation staff per Rule 912.b.(24 hours to remove free fluids. 24 hours for notification and 72 hours for Initial Form 19 Report.)</div>		Date: 10/11/2024
Reportable: _____	GPS: Lat _____	Long _____	
Proximity to Surface Water: _____	Depth to Ground Water: _____		
<b>Water Well Complaint:</b>			
DWR Receipt Num: _____	Owner Name: _____	GPS : _____	Lat _____ Long _____
<b>Field Parameters:</b>			
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 \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002c. PROTECTION OF SOILS \_\_\_\_\_ Fail \_\_\_\_\_

Comment

This location does not comply with Rule 1002.c. It was observed during this inspection that the excavated pit and salt kill areas, and stockpiled materials, remain unstabilized with evidence of unconsolidated materials. No apparent liners were observed underneath the stockpiles of impacted materials from the pit or salt kill excavations. Additionally, a new stockpile immediately adjacent to the wellhead was observed on a plastic liner with no apparent perimeter stormwater control measures, or visible sign or documentation for the origin of material.

It does not appear that the corrective action has been performed since previously documented in FIR (doc #708201331). Original corrective action date remains applicable.

Corrective Action

Comply with Rule 1002.c. (Original CA Date: 01/24/2024).

Date **01/24/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment

Disturbances resulting from excavation of the pit and the salt kill area remain evident. These disturbances have not been approved with a F27 work plan for the excavation of the pit or salt kill areas. The total disturbance area represents approx. 3.10 acres, with an excavated area of approx. 1.5 acres in total, and a combined stockpile quantity of approx. 6300 CY (approx. 0.75 acres).

Additionally, it was observed that vehicle traffic is occurring outside of the established access road, near the Y intersection at the locked gate northeast of the location. Any portions of vegetation that fails to recover/reestablish will require additional reclamation activities. Refer to attached inspection photos.

Corrective Action

Operator shall abide by the reclamation rules to minimize surface disturbances per Rule 1002.e. Inform any contractors and personnel about restrictive off site travel (original CA date of 10/16/2023 when the location was first observed out of compliance).

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

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. Impacted material from the pit and salt kill areas remains stockpiled on location and do not appear to be properly stabilized to prevent wind/water erosion as they are unconsolidated materials. Staff estimates that approx. 1.5 acres has been excavated resulting in two stockpiles totaling approx. 6,300CY of material (approx. 0.75 acres). Drone aerial imagery conducted during previous inspections estimates a total disturbance area of 3.10 acres- which includes the salt kill areas, excavation areas and stockpiled soils. Refer to attached 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 \_\_\_\_\_

Cropland: perennial forage

Non cropland: Revegetated 80% \_\_\_\_\_

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:

It does not appear that the corrective actions documented in previous FIRs have been resolved. Straw wattles are either degraded or not installed properly and erosion degradation observed throughout the location does not appear to have been repaired. Additionally, there is evidence of sediment transport into the adjacent drainage on the northwestern portion of the pit excavation (refer to Environmental Sectional for additional) and near the western stockpile. A new stockpile near the wellhead does not appear to have adequate perimeter stormwater controls and is migrating off of the liner. Stormwater control measures remain inadequate for this location. Refer to attached inspection photos.

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

Permit: 

Facility ID	Permit Num	Expiration Date
256303	846025	

Attached Documents

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

Document Num	Description	URL
708201672	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738500">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738500</a>