

**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:

708201668

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

10 Number of Comments

7 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		steve@westernoperating.com	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
100310	PIT	AC			-	PROPST 1A	RI
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	RI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	PROPST 1	RI
256304	PIT	AC			-	PROPST 1-A	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 to the previous FIR (doc #708201457) conducted on 07/29/2024.

Refer to Environmental FIR (doc #709100422) 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**

<b>Lease Road:</b>			
Type			
comment:	Pothole/subsidence previously documented in FIR (doc #708201457) appears to have been repaired/covered.		
Corrective ActionL		Date:	

Overall Good: ☐

Emergency Contact Number:

Comment:		Date: _____
Corrective Action:		

**Good Housekeeping:**

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 #708201457) and does not appear to have been completed.		
Corrective Action:	Comply with Rule 606 and manage undesirable vegetation (Original CA Date: 08/13/2024)	Date:	08/13/2024
Type	OTHER		
Comment:	Free fluids within the secondary containment at day tank previously documented in FIR (doc #708201457, #708201332 and #708201239) appear to have been removed/disposed of.		
Corrective Action:		Date:	

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:



**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 CA Date: 04/09/2024).

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, ECOMC 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). 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 _____
Gravel removed _____	Contoured _____
Location and associated production facilities reclaimed _____	Culverts removed _____
Compaction alleviation _____	Locations, facilities, roads, recontoured _____
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 <input type="checkbox"/>
	Multi-Well Location <input type="checkbox"/>

**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. It does not appear that any additional stormwater control measures/BMPs have been implemented or that any existing erosion degradation has been stabilized and/or repaired. Impacted material stockpiles remain unstabilized as they have been left unconsolidated. There are no apparent perimeter stormwater control measures around the stockpiled materials, which show evidence of rilling and sediment discharge outside of the fenced portions. 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. It does not appear that this corrective action has been addressed; the original CA date remains the same. Refer to attached inspection photos.			Date: 05/15/2024
Corrective Action	Comply with Rule 1202.a(4)B. (Original CA Date: 05/15/2024).			
Anchor Trench Present:	Oil Accumulation:		2+ feet Freeboard:	
Comment:				Date:
Corrective Action				
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
708201673	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738501">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738501</a>