

**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:

10/09/2024

Document Number:

709100422

**FIELD INSPECTION FORM**

Loc ID: 312291  
Inspector Name: Heibel, Krystal  
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:**

- 14 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         |
|-----------------|----------------|-----------------------------|-----------------|
| Krystal Heibel  |                | krystal.heibel@state.co.us  |                 |
| James, Steven   | (303) 893-2438 | steve@westernoperating.com  | All Inspections |
| Kyle Waggoner   |                | kyle.waggoner@state.co.us   |                 |
| Alex Fischer    |                | alex.fischer@state.co.us    |                 |
| Ryan Finley     |                | rfinley@entradainc.com      |                 |
| Dylan Edwardson |                | dylan.edwardson@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                           | EI          |
| 479472      | TANK BATTERY | AC     | 02/23/2021  |            | -       | PROPST Tank Battery 611N53W /26SWSW | EI          |

**General Comment:**

On September 30, 2024, ECMC Environmental Staff Krystal Heibel and Dylan Edwardson 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 sunny and temperature was about 80 degrees Fahrenheit. For the most recent field inspection report of this facility, please refer to Document #s 709100348 & 712100017.

The following is a summary: At the time of inspection, Pit Facility ID 256304 had fluid levels approx. 15-20 feet below top of berm and fluids were not being disposed of into the pit. Hydrocarbons were not observed around the pit. Prior excavation activity resulted in a stockpile to the south of the pit and an additional stockpile to the west of the pit. It appears this 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 visible from a distance  |          |                  |
| Corrective Action:                                     |   |          | Date: _____      |
| <b>Good Housekeeping:</b>                              |   |          |                  |
| Type   | OTHER   |          |                  |
| Comment:   | During the June 13, 2024, (Doc #709100326) and March 20, 2024 (Doc# 709100243) inspections, 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  | Tank  | <= 1 bbl |                  |
| Comment:   | Hydrocarbon soil staining observed near the loadout.  |          |                  |
| Corrective Action:                                     | Properly dispose of oily waste in accordance with 905.e.  |          | Date: 08/23/2023 |
| In Containment: No                                     |   |          |                  |
| Comment:   |   |          |                  |
| <input 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>                                      |   |          |                  |
| Type:  | #   |          | corrective date  |

|                    |   |       |                   |
|--------------------|---|-------|-------------------|
| 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: | <u>11/20/2023</u> |
| Type:              | #   |       |                   |
| 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: | <u>08/23/2023</u> |
| 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: | <u>08/10/2023</u> |
| Type:              | #   |       |                   |
| Comment:           | A 300 bbl steel tank added to site without an impervious synthetic or engineered liner underneath. Secondary containment is not sufficiently impervious to contain spilled or released materials. |       |                   |
| Corrective Action: | Comply with Rule 603.o.(3). Install liner material to ensure spill or released materials will be maintained with containment structure.   | Date: | <u>10/06/2024</u> |

**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: EI

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: EI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

**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# 708201668 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     |                 |

**Attached Documents**

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

| Document Num | Description | URL   |
|--------------|-------------|---|
| 709100426    | Pics        | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738929">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738929</a> |