

**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:

10/03/2024

Submitted Date:

10/08/2024

Document Number:

713601504**FIELD INSPECTION FORM**Loc ID 324797 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: **Operator Information:**ECMC Operator Number: 95620Name of Operator: WESTERN OPERATING COMPANYAddress: 1165 DELAWARE STREET #200City: 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 Comments3 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
ECMC Enforcement		dnr_ecmcenforcement@state.co.us	
Sanchez, Chris		chris.sanchez@state.co.us	
James, Steven	(303) 893-2438	steve@westernoperating.com	
Hart, Dale	719-688-1638	dale@westernoperating.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
324797	LOCATION	AC			-	DAWSON A-619S45W 9NENW	RI
481653	SPILL OR RELEASE	CL	03/14/2022		-	Dawson A 1 tank battery	RI

**General Comment:**

This a follow up reclamation inspection and in regard to NOAV #403483596.  
See attached photos and additional details within this report.

**Location**

<b>Lease Road:</b>			
Type	Main		
comment:	There are concerns with the road which is ~4 feet below grade of the adjacent landscape which causes snow to drift in and accumulate during the winter. BMP's will need to be installed.		
Corrective ActionL		Date:	

Overall Good: ☐

<b>Signs/Marker:</b>			
Type	WELLHEAD		
Comment:	The sign at the wellhead is missing operator information and must be updated.		
Corrective Action:	Install sign to comply with Rule 605.d.	Date:	11/08/2024

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

Overall Good: ☐

<b>Spills:</b>					
Type	Area	Volume			

In Containment: No

Comment:

☐ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS	
	3	300 BBLS	STEEL AST		,	
Comment:	New tanks have been installed at the offsite tank battery.					
Corrective Action:					Date:	

**Paint**

Condition		
Other (Content)		
Other (Capacity)		
Other (Type)		

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Metal	Adequate	Walls Sufficent	Base Sufficient	Adequate
Comment:	The secondary containment has been installed with a liner and steel containment.			
Corrective Action:			Date:	

**Venting:**

Yes/No			
Comment:			

Corrective Action:		Date:	
<b>Flaring:</b>			
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                     

Comment                     

Corrective Action                      Date                     

1002c. PROTECTION OF SOILS                     

Comment                     

Corrective Action                      Date                     

1002E. SURFACE DISTRURBANCE MINIMIZATION                     

Comment                     

Corrective Action                      Date                     

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? \_\_\_\_\_ 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? \_\_\_\_\_
- 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

Remediation Project #20712 remains ongoing and excavation has been open for more than 24 months. Remediation and reclamation does not appear to be progressing. All disturbed areas must be recontoured and reclaimed per 1003 Rules. Soil was imported and stockpiled at the location and has not been stabilized. Previous corrective action has not been completed.

The location and remediation disturbance must be maintained for stormwater/wind erosion and noxious weed control.

There is new disturbance from the flowline installation and soils must be regraded, seeded, and stabilized to prevent erosion.

Corrective Action

Comply with the 1003 interim reclamation rules.

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: 

There is evident wind erosion occurring at the tank battery location where soils are stockpiled. The wattles around the stock pile have filled in with sediment and sediment has blown offsite. Stored soils need to be stabilized to prevent erosion. Previous corrective action was not completed.

Corrective Action: 

Install or repair required BMPs per Rule 1002.f.(2)

Date: \_\_\_\_\_

Pits: ☐ NO SURFACE INDICATION OF PIT

ECMC Comments		
Comment	User	Date
Remediation Project #20712 remains ongoing and excavation has been open for more than 24 months. Operator must continue quarterly reporting until the site investigation is complete and Full Table 915-1 standards are met within the remediation area. Last form 27 report appears to have been submitted on 3/5/2024 which is beyond the 90 day reporting requirement.	CostaR	10/08/2024

Attached Documents

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

Document Num	Description	URL
403950384	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738466">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738466</a>
713601505	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738455">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6738455</a>