

**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:

10/29/2024

Submitted Date:

11/07/2024

Document Number:

709100441**FIELD INSPECTION FORM**Loc ID 312291 Inspector Name: Heibel, Krystal 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:**13 Number of Comments8 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	(303) 893-2438	steve@westernoperating.com	<a href="#">All Inspections</a>
Kyle Waggoner		kyle.waggoner@state.co.us	
Alex Fischer		alex.fischer@state.co.us	
Krystal Heibel		krystal.heibel@state.co.us	
Dylan Edwardson		dylan.edwardson@state.co.us	
Ryan Finley		rfinley@entradainc.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
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	EI

**General Comment:**

On October 29, 2024, ECMC Environmental Staff Krystal Heibel, Dylan Edwardson, Alex Fischer 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).

For the most recent field inspection report of this facility, please refer to Document #709100422.

The following is a summary: At the time of inspection, Pit Facility ID 256304 had less than 1 foot of fluid levels 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: ☐

<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

Overall Good: ☐

<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: During the Dec 28, 2023, (Doc #709100197) and March 20, 2024 inspections, water within the pit was a shade of pink/red.

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.

The Corrective Action date for this was 11/20/2024.

Entrada was prepared to collect a sample on October 29, 2024, but were unable to due to the lack of fluids in the pit.

☐ 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:	#		

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:	#		
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#708201764 for additional Interim Reclamation and Stormwater Inspection information.

Corrective Action:

Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

Attached Documents

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

Document Num	Description	URL
403987026	INSPECTION SUBMITTED	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778087">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778087</a>
709100446	Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778070">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778070</a>
709100447	Pictures	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778071">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6778071</a>