

State of Colorado  
Energy & Carbon Management Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

404055783

Date Received:

01/13/2025

## FIR RESOLUTION FORM

**Overall Status:**

CA Summary:

2 of 3 CAs from the FIR responded to on this Form

2 CA Completed  
0 Factual Review Request

### OPERATOR INFORMATION

ECMC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 1165 DELAWARE STREET #200

City: DENVER State: CO Zip: 80204

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) Fax: ( )

Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
Kyle Waggoner		<a href="mailto:kyle.waggoner@state.co.us">kyle.waggoner@state.co.us</a>
Ryan Finley		<a href="mailto:rfinley@entradainc.com">rfinley@entradainc.com</a>
JAMES, STEVEN D	303-893-2438 Office	<a href="mailto:steve@westernoperating.com">steve@westernoperating.com</a>
Krystal Heibel		<a href="mailto:krystal.heibel@state.co.us">krystal.heibel@state.co.us</a>

ECMC INSPECTION SUMMARY:

FIR Document Number: 709100462

Inspection Date: 12/04/2024

FIR Submit Date: 12/09/2024

FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: WESTERN OPERATING COMPANY

Company Number: 95620

Address: 1165 DELAWARE STREET #200

City: DENVER State: CO Zip: 80204

LOCATION - Location ID: 312233

Location Name: ROPER-611N53W Number: 23SWNE County: \_\_\_\_\_

Qtrqtr: SWNE Sec: 23 Twp: 11N Range: 53W Meridian: 6

Latitude: 40.914656 Longitude: -103.255038

FACILITY - API Number: 05-075- -00 Facility ID: 270650

Facility Name: ROPER #E-1X Number: \_\_\_\_\_

Qtrqtr: SWNE Sec: 23 Twp: 11N Range: 53W Meridian: 6

Latitude: 40.914656 Longitude: -103.255038

CORRECTIVE ACTIONS:

1 CA# 200908

Corrective Action:

Date: 12/09/2024

Report spill or release of E&P waste via a Form 19 and contact ECMC EPS Staff (krystal.heibel@state.co.us) per Rule 912.b.

Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).

Response: CA COMPLETED

Date of Completion: 12/19/2024

Operator Comment: Per phone and email correspondence with ECMC EPS Krystal Heibel (see attached), Operator requested to immediately investigate the nature and volume of the suspected impacted soils, identified as surface staining in FIR 709100462, prior to reporting a spill or release via Form 19. Western Operating determined the suspected volume was less than 10 cubic yards or 1 barrel of E&P waste spilled or released and removed the suspected impacted soil for disposal at Pawnee Waste, LLC. Approximately 1.34 tons of soil were removed in total from both separate stained soil locations, and is below the reporting threshold of 10 cubic yards. Please see attached split waste manifest with Roper impacted soils comingled in transport with impacted soils removed at the nearby Propst 2 location (see sub-item 2 on attached manifest "Generating Location") due to Pawnee Waste not accepting volumes less than 10 cubic yards for disposal. Please see attached photolog for documentation of remedial efforts. The root cause of the staining at both locations was identified as small volume spills from operation and maintenance activities. Western Operating has instructed operations and maintenance crew to prevent spills of any volume during operations, conduct housekeeping efforts to remove small volume surface staining, and to immediately report any discovered spill or release whose volume is suspected to exceed 10 cubic yards or 1 barrel of E&P waste, or where the volume cannot immediately be determined. If this information is sufficient to complete corrective actions, Western Operating requests a followup Field Inspection to verify the completed actions.

ECMC Decision:

ECMC Representative:

2 CA# 200909

Corrective Action: Report spill or release of E&P waste via a Form 19 and contact ECMC EPS staff per Rule 912.b. Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).

Date: 12/09/2024

Response: CA COMPLETED

Date of Completion: 12/19/2024

Operator Comment: Per phone and email correspondence with ECMC EPS Krystal Heibel (see attached), Operator requested to immediately investigate the nature and volume of the suspected impacted soils, identified as surface staining in FIR 709100462, prior to reporting a spill or release via Form 19. Western Operating determined the suspected volume was less than 10 cubic yards or 1 barrel of E&P waste spilled or released and removed the suspected impacted soil for disposal at Pawnee Waste, LLC. Approximately 1.34 tons of soil were removed in total from both separate stained soil locations, and is below the reporting threshold of 10 cubic yards. Please see attached split waste manifest with Roper impacted soils comingled in transport with impacted soils removed at the nearby Propst 2 location (see sub-item 2 on attached manifest "Generating Location") due to Pawnee Waste not accepting volumes less than 10 cubic yards for disposal. Please see attached photolog for documentation of remedial efforts. The root cause of the staining at both locations was identified as small volume spills from operation and maintenance activities. Western Operating has instructed operations and maintenance crew to prevent spills of any volume during operations, conduct housekeeping efforts to remove small volume surface staining, and to immediately report any discovered spill or release whose volume is suspected to exceed 10 cubic yards or 1 barrel of E&P waste, or where the volume cannot immediately be determined. If this information is sufficient to complete corrective actions, Western Operating requests a followup Field Inspection to verify the completed actions.

ECMC Decision:

ECMC Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: Per phone and email correspondence with ECMC EPS Krystal Heibel (see attached), Operator requested to immediately investigate the nature and volume of the suspected impacted soils, identified as surface staining in FIR 709100462, prior to reporting a spill or release via Form 19.

Western Operating determined the suspected volume was less than 10 cubic yards or 1 barrel of E&P waste spilled or released and removed the suspected impacted soil for disposal at Pawnee Waste, LLC. Approximately 1.34 tons of soil were removed in total from both separate stained soil locations, and is below the reporting threshold of 10 cubic yards. Please see attached split waste manifest with Roper impacted soils comingled in transport with impacted soils removed at the nearby Propst 2 location (see sub-item 2 on attached manifest "Generating Location") due to Pawnee Waste not accepting volumes less than 10 cubic yards for disposal. Please see attached photolog for documentation of remedial efforts.

The root cause of the staining at both locations was identified as small volume spills from operation and maintenance activities. Western Operating has instructed operations and maintenance crew to prevent spills of any volume during operations, conduct housekeeping efforts to remove small volume surface staining, and to immediately report any discovered spill or release whose volume is suspected to exceed 10 cubic yards or 1 barrel of E&P waste, or where the volume cannot immediately be determined. If this information is sufficient to complete corrective actions, Western Operating requests a follow-up Field Inspection to verify the completed actions.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Ryan Finley

Signed: \_\_\_\_\_

Title: Senior Project Geologist

Date: 1/13/2025 12:51:02 PM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on ECMC website (<http://ecmcweblink.state.co.us/>) - Search by Document Number.

<b><u>Document Number</u></b>	<b><u>Description</u></b>
404055783	FIR RESOLUTION SUBMITTED
404055848	Correspondence
404055850	Waste Manifest
404055853	Photolog

Total Attach: 4 Files