

**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:

02/03/2025

Submitted Date:

02/04/2025

Document Number:

718700029**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Edwardson, Dylan 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:7 Number of Comments2 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
Heibel, Krystal		krystal.heibel@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
		rfinley@entradainc.com	
Waggoner, Kyle		kyle.waggoner@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	SI	05/01/2024	OW	075-09212	PROPST 2	RI
312292	LOCATION	AC	12/12/2024		-	PROPST-611N53W 27NESE	RI
488502	SPILL OR RELEASE	CL	11/19/2024		-	Propst 2 Sediment Runoff	RI
488709	TANK BATTERY	AC	12/12/2024		-	Propst B-2 production facility 488709	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and to the previous FIR (doc #708201763) conducted on 10/29/2024.

Operator submitted FIRR (doc #404010125) stating that corrective actions from the previous inspection have been completed.

Refer to Environmental FIR (doc #709100481) conducted on 02/03/2025 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.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type

WEEDS

Comment:

Previous FIR (doc #708201456) documented kochia and russian thistle throughout the location. Operator submitted FIRR (doc #404010125) stating that undesirable vegetation has been removed from the location.

During this inspection, it was observed that russian thistle and kochia appears to have been removed from the location. Minimal tumbleweed debris remains throughout. Operator shall continue to monitor and manage undesirable vegetation, including removal of tumbleweed debris to prevent spread onto adjacent lands.

Corrective Action: Date: Overall Good: ☐**Spills:**

Type

Area

Volume

In Containment: No

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

Yes/No

Comment: Corrective Action: Date: **Flaring:**

Type

Comment: Corrective Action: Date:

Inspected Facilities				
Facility ID: 221086	Type: WELL	API Number: 075-09212	Status: SI	Insp. Status: RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12				
Facility ID: 312292	Type: LOCATION	API Number: -	Status: AC	Insp. Status: RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12				
Facility ID: 488502	Type: SPILL OR	API Number: -	Status: CL	Insp. Status: RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12				
Facility ID: 488709	Type: TANK	API Number: -	Status: AC	Insp. Status: RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12				

Environmental			
Spills/Releases:			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:		<div>Previous FIRs (doc #708201667 & 708201763) required the Operator to submit a Form 19 as result of sediment transport from the impacted salt kill excavations into adjacent drainage. Operator responded with FIRR (doc #404010125) stating that Form 19 (doc #403995180) had been submitted on 11/15/2024. Work is proceeding under Remediation Project #27157.</div>	
Corrective Action: _____		Date: _____	
Reportable: _____		GPS: Lat _____ Long _____	
Proximity to Surface Water: _____		Depth to Ground Water: _____	
Water Well Complaint:			
DWR Receipt Num: _____		Owner Name: _____ GPS : _____	
Field Parameters: _____			
Sample Location: _____		Comment: _____	

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____ In Process _____

Comment _____

Stockpiled materials within the salt kill excavation appear to have been equipment tracked with compacted berms around the perimeters to prevent migration of impacted material off-site. Operator shall continue to monitor and manage stockpiled soils in compliance with Rule 1002.c.

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Vehicle traffic is continuing to occur outside of the established access road, near the Y intersection northeast of the location. This is likely from mobilization of heavy equipment in and out of the location; Operator shall make efforts to minimize impact outside of the original disturbance areas. Any vegetation outside of the original disturbance area that fails to recover/reestablish will require additional reclamation activities. Refer to attached inspection photos.

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? 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 REVEGETATIONCropland

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 It does not appear any additional reclamation activities have been performed since the previous inspection(s). Portions of the location that are not part of active remediation projects require reclamation activities; this included but is not limited to - unstabilized areas experiencing bare soils or non uniform vegetation cover. 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 _____ 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:	<div></div>	
Corrective Action:	<div></div>	Date <div></div>
Overall Final Reclamation <div></div>	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:	<div>Previous FIRs have documented inadequate stormwater management for this location. Operator submitted FIRR (doc #404010125) stating that corrective actions have been completed. During this inspection, it was observed that additional stormwater control measures were implemented with installation of straw wattles (appear to be installed per good engineering practices), berm construction (appear to be compacted) silt fence (near drainage, northside of pit) and surface roughening within excavations. However, additional stormwater controls are required as sediment transport and erosion degradation was observed around excavations. Refer to attached inspection photos for additional information.</div>	
Corrective Action:	<div>Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices and repair erosion degradation.</div>	Date: <div></div>
Pits: <input type="checkbox"/> 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
404082132	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6905905
718700033	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6905885