



DEPARTMENT OF NATURAL RESOURCES  
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## COGIS - NOAV Report

### Operator Information

<b>DocNum:</b>	200392590	<b>Date Rec'd:</b>	12/13/2013
<b>Operator:</b>	WESTERN OPERATING COMPANY	<b>Oper. No.</b>	95620
<b>Address:</b>	518 17TH ST STE 200 ATTN: MR. STEVEN D JAMES DENVER , CO 80202		
<b>Company Rep.</b>	STEVEN JAMES		
<b>Well Name/No.</b>	FORBES 1-14		
<b>Location</b>	T R		
<b>Fac.ID:</b>		<b>Fac.Type:</b>	
<b>API number:</b>	05-121 -06758	<b>County</b>	
<b>COGCC Rep:</b>	JOHN NOTO	<b>Phone:</b>	(303 ) 400-6136

### Alleged Violation:

**Date of Alleged Violation:** 11/20/2013

**Approx. time of violation:**

COGCC performed an inspection on 11/20/2013 (doc #670600111) and observed that the former unlined earthen skim pit was closed without submittal of a Form 27, Investigation and Remediation Workplan, and without prior approval from COGCC as required by Rule 905.b. The skim pit was replaced with a 200 bbl partially buried fiberglass tank. The operator did not provide COGCC with any documentation for the skim pit closures or the disposition of E&P waste generated from the pit closure. The produced water pit at the location is still in use. Based on aerial photos the skim pit was closure was in progress during the Summer of 2011 and was completed prior to June 1013.

### Act, Order, Regulation, Permit Conditions Cited:

Rule 324A.a, Rule 603.f, Rule 902, Rule 905.b, Rule 907.a, Rule 907.e, Rule 909, Rule 910

### Abatement or Corrective Action Required to be Performed by Operator

Submit a Form 27 to document closure of former skim pits and for treatment or disposal of E&P waste. If oily waste was removed from the skim pit prior to closure and samples collected, remit sample location diagram, analytical results, laboratory report and waste disposal documentation with a Form 27. If oily waste was not removed prior to closure, remove contaminated soil, and collect confirmation samples to verify compliance with Table 910-1. All waste removed shall be treated or disposed in accordance with Rule 907.e. Remove the three unused 500 Barrel steel tanks stored on site that are out of compliance with Rule 603.f. NOAV # 200376557 was previously issued to Western Operating for improper closure of pits at the Peck A-1 (API #121-06775) in February 2013. Western Operating shall immediately notify COGCC in writing of any other pits that they have improperly closed without submittal of a Form 27 or prior approval as required by Rule 905.b. Notification shall include location, Pit Facility ID#, related well API#, date of closure and disposition of E&P waste.

### Abatement or Corrective Action Required to be Completed by: 3/1/2013