

**FORM
INSP**Rev
05/11**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

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Inspection Date:

04/07/2015

Document Number:

668303470

Overall Inspection:

ACTION REQUIRED**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>219978</u>	<u>312255</u>	<u>SCHURE, KYM</u>	<input type="checkbox"/>	

Operator Information:OGCC Operator Number: 95620Name of Operator: WESTERN OPERATING COMPANYAddress: 518 17TH ST STE 200City: DENVER State: CO Zip: 80202

- ☐ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED
- ☒ INSPECTOR REQUESTS FORM 42 WHEN CORRECTIVE ACTIONS ARE COMPLETED

Contact Information:

Contact Name	Phone	Email	Comment
Young, Rob		rob.young@state.co.us	
Axelson, John		john.axelson@state.co.us	
James, Steven	(303) 893-2438	s.d.james@att.net	
Quint, Craig		craig.quint@state.co.us	

Compliance Summary:QtrQtr: NWNE Sec: 34 Twp: 9N Range: 54W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
08/25/2010	200268742	SR	PR	SATISFACTORY	I		No
01/23/2004	200048998	PR	PR	SATISFACTORY		Pass	No
01/11/1996	500153428	PR	PR			Pass	No
08/28/1995	500153427	PR	PR			Pass	No

Inspector Comment:

COGCC N.E. Field Office received notification from Operator's representative at approx. 8:00am on 04/07/2015 upon discovering a spill/release originating from the PW tank within the containment berm at the the battery location. Berm containment was breached releasing fluid onto surrounding area beginning at the south-east corner of berm traveling in a south by south-east and west by south/south west direction from the tank battery following a pathway extending east and south-east along lease road and between separator location and PW pit. Operator suspects a mechanical failure at PW tank. Heavy fog existed throughout the previous night and morning of the event, confirmed by Inspector Schure. Operator had notified/employed a consultant/contractor (LT Environmental) regarding the release for assessment/remediation upon discovery of release. No surface water or waters of the state impacted by spill/release. Corrective action dates apply to Form 19 submittal from Operator to COGCC per Rule 906 b. (2) & (5). Total quantity/volume of release is undetermined at time of this inspection, estimated @ >20 bbl., please contact COGCC Environmental for directives. Corrective action dates apply to Form 19 submittal by Operator per 906 b. (2) if determined applicable.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
219978	WELL	PR	10/14/2010	OW	075-08097	EMERALD 6-34	PR	<input checked="" type="checkbox"/>

Equipment:**Location Inventory**

Inspector Name: SCHURE, KYM

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	Production Pits: _____
Condensate Tanks: _____	Water Tanks: _____	Separators: _____	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: _____	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: _____	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

Location

Lease Road:

Type	Satisfactory/Action Required	comment	Corrective Action	Date
Other	ACTION REQUIRED	Lease road leading to adjacent injection well affected by release.	Remove/remediate soils affected by release. 900 series Rule and Regulations apply. Corrective action date applies to Form 19 submittal.	04/08/2015
Access	SATISFACTORY	Lease road to wellhead satisfactory.		

Signs/Marker:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
WELLHEAD	SATISFACTORY			
BATTERY	SATISFACTORY	Temporarily removed during site remediation, replace sign upon completion of corrective actions.		

Emergency Contact Number (S/A/V): SATISFACTORY

Corrective Date: _____

Comment: _____

Corrective Action: _____

Spills:

Type	Area	Volume	Corrective action	CA Date
PW/CO	Tank	> 5 bbls	Remove/remediate affected soils. 900 series Rules and Regulations apply. See attached photographs. Corrective action date applies to Form 19 submittal.	04/08/2015

☐ Multiple Spills and Releases?

Fencing/:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
LOCATION	SATISFACTORY			

Equipment:

Type	#	Satisfactory/Action Required	Comment	Corrective Action	CA Date
Vertical Heated Separator	1	SATISFACTORY			
Ancillary equipment	1	SATISFACTORY	propane tank		
Pump Jack	1	SATISFACTORY	electric motor		

Inspector Name: SCHURE, KYM

Deadman # & Marked	5	SATISFACTORY			
Bird Protectors	1	SATISFACTORY			

Facilities: ☐ New Tank Tank ID: _____

Contents	#	Capacity	Type	SE GPS
PRODUCED WATER	1	300 BBLS	STEEL AST	,

S/A/V:		Comment:	
Corrective Action:		Corrective Date:	

Paint

Condition	
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Other (Content) _____

Other (Capacity) _____

Other (Type) _____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance

Corrective Action		Corrective Date	
Comment			

Facilities: ☐ New Tank Tank ID: _____

Contents	#	Capacity	Type	SE GPS
CRUDE OIL	2	500 BBLS	STEEL AST	,

S/A/V:	ACTION REQUIRED	Comment:	Initial estimate of volume/quantity of total release >20 bbls. Contact COGCC Environmental for determination and directives. Corrective action dates apply to Form 19 submittal to COGCC.
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Corrective Action:	Spill/release evaluation per Rule 900 e. (2)	Corrective Date:	04/17/2015
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Paint

Condition	
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Other (Content) _____

Other (Capacity) _____

Other (Type) _____

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Adequate	Walls Insufficient	Base Sufficient	Adequate

Corrective Action	Repair/restore berm at tank battery. Maintain berm at separator (SE) corner.	Corrective Date	04/15/2015
Comment			

Venting:

Yes/No	Comment

Flaring:

Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Predrill

Location ID: 219978

Site Preparation:

Lease Road Adeq.: _____ Pads: _____ Soil Stockpile: _____

S/A/V: _____

Corrective Action: _____ Date: _____ CDP Num.: _____

Form 2A COAs:**S/A/V:** _____ **Comment:** _____**CA:** _____ **Date:** _____**Wildlife BMPs:****S/A/V:** _____ **Comment:** _____**CA:** _____ **Date:** _____**Stormwater:****Comment:** _____**Staking:****On Site Inspection (305):****Surface Owner Contact Information:**

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:**Summary of Operator Response to Landowner Issues:****Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:****Facility**

Facility ID: 219978 Type: WELL API Number: 075-08097 Status: PR Insp. Status: PR

Producing Well

Comment: Spill/Release See full document for details.

Environmental**Spills/Releases:**

Type of Spill: WATER Description: PW-CO Estimated Spill Volume: _____

Comment: PW-CO release from PW tank, resulting in breached berm at battery. Spill was controlled upon discovery and COGCC N.E. Field Office was notified upon discovery at approx. 8:00am on 04/07/2015. Corrective action date applies to submittal of Form 19.

Corrective Action: Analysis/Remove/Remediate affected area. Date: 04/08/2015

Reportable: <input type="checkbox"/> YES	GPS: Lat _____	Long _____
Proximity to Surface Water: _____	Depth to Ground Water: _____	
Water Well:		
DWR Receipt Num: _____	Owner Name: _____	GPS : _____
Lat _____ Long _____		
Field Parameters:		
Sample Location: _____		
Emission Control Burner (ECB): _____		
Comment: _____		
Pilot: _____	Wildlife Protection Devices (fired vessels): _____	
Reclamation - Storm Water - Pit		
Interim Reclamation:		
Date Interim Reclamation Started: _____	Date Interim Reclamation Completed: _____	
Land Use: _____		
Comment: _____		
1003a.	Debris removed? _____ CM _____	
	CA _____	CA Date _____
	Waste Material Onsite? _____ CM _____	
	CA _____	CA Date _____
	Unused or unneeded equipment onsite? _____ CM _____	
	CA _____	CA Date _____
	Pit, cellars, rat holes and other bores closed? _____ CM _____	
	CA _____	CA Date _____
	Guy line anchors removed? _____ CM _____	
	CA _____	CA Date _____
	Guy line anchors marked? _____ CM _____	
	CA _____	CA 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		
<u>Cropland</u>		
Top soil replaced _____	Recontoured _____	Perennial forage re-established _____
<u>Non-Cropland</u>		
Top soil replaced _____	Recontoured _____	80% Revegetation _____

Inspector Name: SCHURE, KYM

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation

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 _____

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
Gravel	Pass					

S/A/V: SATISFACTOR
Y

Corrective Date: _____

Comment: No surface erosion from stormwater runoff observed. Utilize BMP's for control and maintenance.

CA: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Operator Note: Please contact COGCC Environmental for directives.	schureky	04/08/2015

Attached Documents

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

Document Num	Description	URL
668303471	E&P Waste inside containment berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586124
668303472	Viewing south from northern berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586125
668303473	Viewing south from western berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586126

668303474	Remaining product inside berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586127
668303475	Viewing east from western berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586128
668303476	Pathway from breach west by south east at separator	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586129
668303477	Tank placarding	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586130
668303478	Viewing east-south east from western berm at battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586131
668303479	Viewing south by southeast from battery pad	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586132
668303480	Signage at separator	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586133
668303481	Viewing east from battery pad @ separator	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586134
668303482	Pathway around separator berm east	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586135
668303483	Breached berm @ southeast corner of tank battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586136
668303484	Pathway east on lease road @ cattle guard	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586137
668303485	Pathway east by southeast of tank battery	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586138
668303486	Pathway east on adjacent lease road	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586139
668303487	Overflow at PW tank	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586140
668303488	Signage @ wellhead	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3586141

ACTION REQUIRED

ANY ACTION REQUIRED items listed on this report indicate that the oil and gas facility or the oil and gas operations listed on the report may be in violation of the rules and regulations of the Colorado Oil and Conservation Commission (“COGCC”) and corrective action is required.

There is reasonable cause to believe that a violation of the Oil and Gas Conservation Act, or of any rule, regulation, or order of the Commission, or of any permit issued by the Commission, has occurred. The Operator’s compliance with this Inspection Report is required to resolve these alleged violations. This document requires the Operator to timely respond to the COGCC and to comply with directives as listed by the **Corrective Action Deadline Date**. Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1. (Please note that the COGCC's penalty authority was recently increased to a maximum of \$15,000 per day and penalties are no longer capped at a maximum of \$10,000 per violation.)