

**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



DE	ET	OE	ES
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Inspection Date:  
06/26/2015

Document Number:  
678200186

Overall Inspection:

**ACTION REQUIRED**

**FIELD INSPECTION FORM**

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>220269</u>	<u>312264</u>	<u>YOUNG, ROB</u>	<input type="checkbox"/>	

**Operator Information:**

OGCC Operator Number:	<u>95620</u>
Name of Operator:	<u>WESTERN OPERATING COMPANY</u>
Address:	<u>518 17TH ST STE 200</u>
City:	<u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>

- 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
Schure, Kym		kym.schure@state.co.us	
James, Steven	(303) 893-2438	s.d.james@att.net	
Axelson, John		john.axelson@state.co.us	

**Compliance Summary:**

QtrQtr:	<u>NWSW</u>	Sec:	<u>35</u>	Twp:	<u>9N</u>	Range:	<u>54W</u>
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Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
12/19/2014	667200788	TA	TA	SATISFACTORY			No
12/03/2014	667200699	TA	TA	SATISFACTORY			No
11/07/2014	667200651	TA	TA	SATISFACTORY			No
01/23/2004	200048996	PR	SI	SATISFACTORY		Pass	No
07/02/1999	500153523	MT					
07/02/1999	872703	PR	SI			Pass	No
01/11/1996	500153522	PR	TA			Fail	Yes

**Inspector Comment:**

Soil stockpiled on plastic associated with Spill #441453 needs to be hauled off site for disposal.Immediately cease use of the unlined oil skim pit and submit a Form 27 for approval to the NE EPS (rob.young@state.co.us).Pit Facility ID 116328 indicates Noble Energy Inc as the Operator. Western shall update the pit records with the COGCC.The fiberglass skim tank on the east side of the produced water pit does not have adequate secondary containment. Install adequate secondary containment by July 31, 2015.Maintain the berm where it has washed out around the separator by July 31, 2015.Oil stained soil, junk, plastic stockpiled in the northwest corner of the tank battery berm needs to be removed and properly disposed of

**Related Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
116328	PIT				-	ROBERT WALTERS	EI	<input checked="" type="checkbox"/>
220269	WELL	TA	01/01/1999	SI	075-08391	EMERALD 2-35	TA	<input type="checkbox"/>
441453	SPILL OR RELEASE	AC			-	SPILL/RELEASE POINT	EI	<input checked="" type="checkbox"/>

**Equipment:**

Location Inventory

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**

Emergency Contact Number (S/A/V): \_\_\_\_\_ Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

<b>Spills:</b>				
Type	Area	Volume	Corrective action	CA Date
<input type="checkbox"/> Multiple Spills and Releases?				

<b>Venting:</b>	
Yes/No	Comment

<b>Flaring:</b>				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

**Predrill**

Location ID: 220269

**Site Preparation:**

Lease Road Adeq.: \_\_\_\_\_ Pads: \_\_\_\_\_ Soil Stockpile: \_\_\_\_\_

**S/AV:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_ CDP Num.: \_\_\_\_\_

**Form 2A COAs:**

**S/AV:** \_\_\_\_\_ **Comment:** \_\_\_\_\_

**CA:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Wildlife BMPs:**

**S/AV:** \_\_\_\_\_ **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: 116328 Type: PIT API Number: - Status: \_\_\_\_\_ Insp. Status: EI

Facility ID: 441453 Type: SPILL OR API Number: - Status: AC Insp. Status: EI

**Environmental**

**Spills/Releases:**

Type of Spill: OIL Description: oil impacted soil Estimated Spill Volume: \_\_\_\_\_

Comment: Initial spill report indicates soil would be scraped up and disposed of and subsequent soil sampling would be performed to demonstrate compliance with Table 910-1 allowable concentrations. No supplemental eForm 19 with the sampling results and soil disposal manifests has been recieved by the COGCC to date.

Corrective Action: Remove oil impacted soil that is stockpiled on plastic for proper off site disposal. Submit Date: 07/24/2015

Reportable: \_\_\_\_\_ GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_  
Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: \_\_\_\_\_

**Water Well:** \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_  
DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_

**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**

Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced \_\_\_\_\_ Recontoured \_\_\_\_\_ 80% Revegetation \_\_\_\_\_

Inspector Name: YOUNG, ROB

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

S/A/V: \_\_\_\_\_

Corrective Date: \_\_\_\_\_

Comment: \_\_\_\_\_

CA: \_\_\_\_\_

**Pits:**  NO SURFACE INDICATION OF PIT

Pit Type: Skimming/Settling Lined: NO Pit ID: \_\_\_\_\_ Lat: \_\_\_\_\_ Long: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: YES 2+ feet Freeboard: \_\_\_\_\_

Pit (S/A/V): ACTION Comment: **Oil skim pit is not properly netted to prevent access by wildlife. At the time of the inspection, the oil skim pit was not maintaining 2 feet of freeboard and was in direct communication with the water in the produced water pit.**

Corrective Action: **Immediately cease use of the unlined oil skim pit. Prepare and submit a Form 27 for prior approval detailing plans for remediation and either installing an adequate lining in the oil skim pit or installing an alternate oil skimming process.** Date: **07/10/2015**

Pit Type: Produced Water Lined: NO Pit ID: 116328 Lat: 40.711407 Long: -103.381910

**Lining:**

Liner Type: \_\_\_\_\_ Liner Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

**Fencing:**

Fencing Type: \_\_\_\_\_ Fencing Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

**Netting:**

Netting Type: \_\_\_\_\_ Netting Condition: \_\_\_\_\_

Comment: \_\_\_\_\_

Anchor Trench Present: \_\_\_\_\_ Oil Accumulation: NO 2+ feet Freeboard: \_\_\_\_\_

Pit (S/A/V): ACTION Comment: **Outer portion of the pit berms are eroding out into the surrounding range land. Adequate freeboard is not being maintained and no method of monitoring freeboard was observed.**

Corrective Action: **Update COGCC pit records or cease use of the produced water pit. Maintain pit berms including removal of the berm material that has been washed off the outsides of the berms onto the surrounding rangeland. Install a method monitor and maintaining 2 feet of freeboard for the produced water pit.** Date: **07/31/2015**

**Attached Documents**

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

Document Num	Description	URL
678200187	Soil stockpiled on plastic, view E toward produced water pit.	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633142">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633142</a>
678200188	View of SE corner of washed out separator berm	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633143">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633143</a>
678200189	View S along E side of produced water pit berm eroding onto rangeland	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633144">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633144</a>
678200190	Unlined oil skim pit, not covered	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633145">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633145</a>

678200191	Inadequate freeboard of oil skim pit and produced water pit	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633146">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633146</a>
678200192	View W across S side of produced water pit berm erosion onto surrounding rangeland	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633147">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633147</a>
678200193	Erosion off SW area of produced water pit	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633148">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633148</a>
678200194	No secondary containment around fiberglass tank	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633149">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633149</a>
678200195	Oil stained soil, junk on plastic in NW corner of tank battery berm	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633150">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3633150</a>

## **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.)