

SURFACE RECLAMATION PLAN
BOBCAT SAND UNIT
WASHINGTON COUNTY, COLORADO

DECEMBER 2015

Prepared for:

WESTERN OPERATION COMPANY
Denver, Colorado



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Prepared for:

WESTERN OPERATING COMPANY
518 17th Street, Suite 200
Denver, Colorado 80202

Prepared by:

LT ENVIRONMENTAL, INC.
4600 West 60th Avenue
Arvada, Colorado 80003
(303) 433-9788



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1.0 RECLAMATION OBJECTIVES

The objectives of final surface reclamation is to return the land, following use for energy development, to a condition approximating that which existed prior to disturbance. This includes restoration of the landform and natural vegetative community, hydrologic systems, ecological function and other natural resource values to maintain healthy, biologically active topsoil; to control erosion and sediment transport; and to minimize loss of habitat, forage, and visual resources. Surface reclamation will be judged successful when disturbed areas have been re-contoured, stabilized, and re-vegetated with a self-sustaining, vigorous, diverse, native (or otherwise approved) plant community sufficient to minimize visual impacts, provide forage, stabilize soils, and impede the invasion of noxious weeds.

Reclamation objectives are provided to ensure understanding of performance standards and Best Management Practices (BMPs), so Western Operating Company (WOC), may implement the BMPs in an effective and cost efficient manner.



2.0 RECLAMATION PERFORMANCE STANDARDS

Operators are required to meet reclamation performance standards. Successful compliance with reclamation performance standards is determined by the Colorado Oil and Gas Conservation Commission (COGCC). See Appendix A for COGCC 1000 Series Reclamation Regulations. If reclamation is unsuccessful, subsequent treatments and actions will be required until reclamation performance standards are met.



3.0 SURFACE RECLAMATION PLAN

The Surface Reclamation Plan is an operator's opportunity to provide plans or analyses that support overall achievement of reclamation objectives. The Surface Reclamation Plan includes the following, to ensure reclamation objectives and standards are met. Changes and additions to a Surface Reclamation Plan may be necessary over the lifetime of a site to achieve the reclamation objectives and standards.

3.1 PRE-EXISTING SITE CONDITIONS

The legal site description is the center of the northwest quarter of Section 9, Township 1 South, Range 56 West, 6th Principal Meridian. The site, Bobcat Sand Unit, is located 0.25 miles south of County Road 29, and 3.8 miles west of Colorado Highway 71 in Washington County, Colorado. The Site Location Map is provided as Figure 1.

The pre-existing land use was rangeland. The terrain was flat with native grasses and sagebrush dominating the plant community.

3.2 CURRENT SITE CONDITIONS

The site's current land use is rangeland. The dominant plant species present are kochia and Russian thistle, both of which are commonly known to be invasive and usually undesirable. Total perennial non-invasive plant cover is below 80 percent (%) of pre-disturbance or reference area vegetation coverage levels required per COGCC Rule 1004.c.(2) . Soils are compacted along the eastern and southern edge of the produced water pit due to berm erosion and runoff. A large gulley has formed off of the eastern portion of the pad where high energy runoff of stormwater has occurred. There is debris onsite.

3.3 RECOMMENDATIONS

3.3.1 Site Improvements

The following site improvements have been addressed or are being addressed in the coming months:

- Debris and weeds onsite have been collected and disposed of.
- Grading onsite where rilling and erosion have occurred will commence once snow has melted and equip can easily access the site.
- The large gulley that has formed east of the battery will be backfilled and repaired in the spring before the reclamation work is done and will be reseeded in a manner consistent with the areas discussed below.
- The areas east of the produced water pit and the eastern edge of the battery are being assessed for the construction of a ditch and berm to catch high energy runoff storm



water and sediment. In the interim, straw wattle is being installed to prevent snow melt run from carrying sediment offsite.

3.3.2 Soil Treatment

Alleviate soil compaction as required by COGCC Rule 1004.a. Rip compacted soil located where berm material has washed over and killed vegetation along perimeter of produced water pit to a minimum depth of 18 inches, unless bedrock is encountered at a shallower depth.

3.3.3 Seeding

Seed the site using seeding recommendations provided by the Landowner to match adjacent rangeland (Appendix B)

3.3.4 Erosion Control

Provide soil stabilization by crimp mulching certified weed-free native grass hay or wheat straw into the seeded areas.

3.3.5 Weed Control

Conduct weed mitigation by mowing the site prior to kochia and Russian thistle seed set. Seed set for these species in this region is typically mid-July through August. More than one mowing event per growing season may be necessary.

3.3.6 Monitoring

Monitor the site biannually during the growing season following reclamation activities to identify whether reclamation objectives and standards are likely to be achieved in the near future without additional actions and/or identify actions that are needed to meet the objectives and standards. Monitoring should be done by a qualified vegetation expert using quantitative methods, such as line-point intercept, during the growing season to determine if the site has achieved 80% of pre-disturbance or reference area vegetation coverage levels excluding undesirable plant species. Documentation of the vegetation monitoring data conducted by the qualified vegetation expert demonstrating that the vegetation meets the 80% standard is required per the COGCC Field Inspection Form (Appendix C).

Special attention should be given to the monitoring of undesirable species or noxious weeds for prompt control if necessary. Additional actions to achieve final reclamation is contingent on monitoring results.

3.3.7 Recordkeeping

Keep a record, such as an invoice and/or other documentation, demonstrating all work completed and data collected on the site that relates to the surface reclamation. This is required per the COGCC Field Inspection Form and is useful in determining further reclamation actions if necessary.



3.3.8 Submit Sundry Notice (Form 4)

Submit a Sundry Notice (Form 4) for final reclamation to the COGCC once the site has achieved the reclamation objectives and standards. Include invoices and/or documentation demonstrating the work completed and data collected on site that directly relates to the reclamation actions required on the COGCC Field Inspection Form.

3.3.9 Previous Reclamation Activities

In April of 2015, TJS Yard of Akron, Colorado conducted reclamation activities in the area referenced in Document 668603249 with regards to a bare area west of a plugged and abandoned wellhead near a flowline. This included the ripping of topsoil, drilling seed, and crimping straw. Some growth was achieved over the growing season of 2015 but WOC is requesting another growing season to allowing for the maximum growth potential of the seed mix before attempting another round of reclamation in the area as this mix can take several years to fully reach maximum coverage. Weed control will be ongoing. .



4.0 CONCLUSIONS

LT Environmental Inc. (LTE) makes the above recommendations in an effort to achieve the best possible reclamation results.

LIMITATIONS

LTE believes that it has performed the services summarized in this report in a manner consistent with the level of care and skill ordinarily exercised by members of the environmental profession practicing at the same time and under similar conditions in the area of the project.



FIGURES

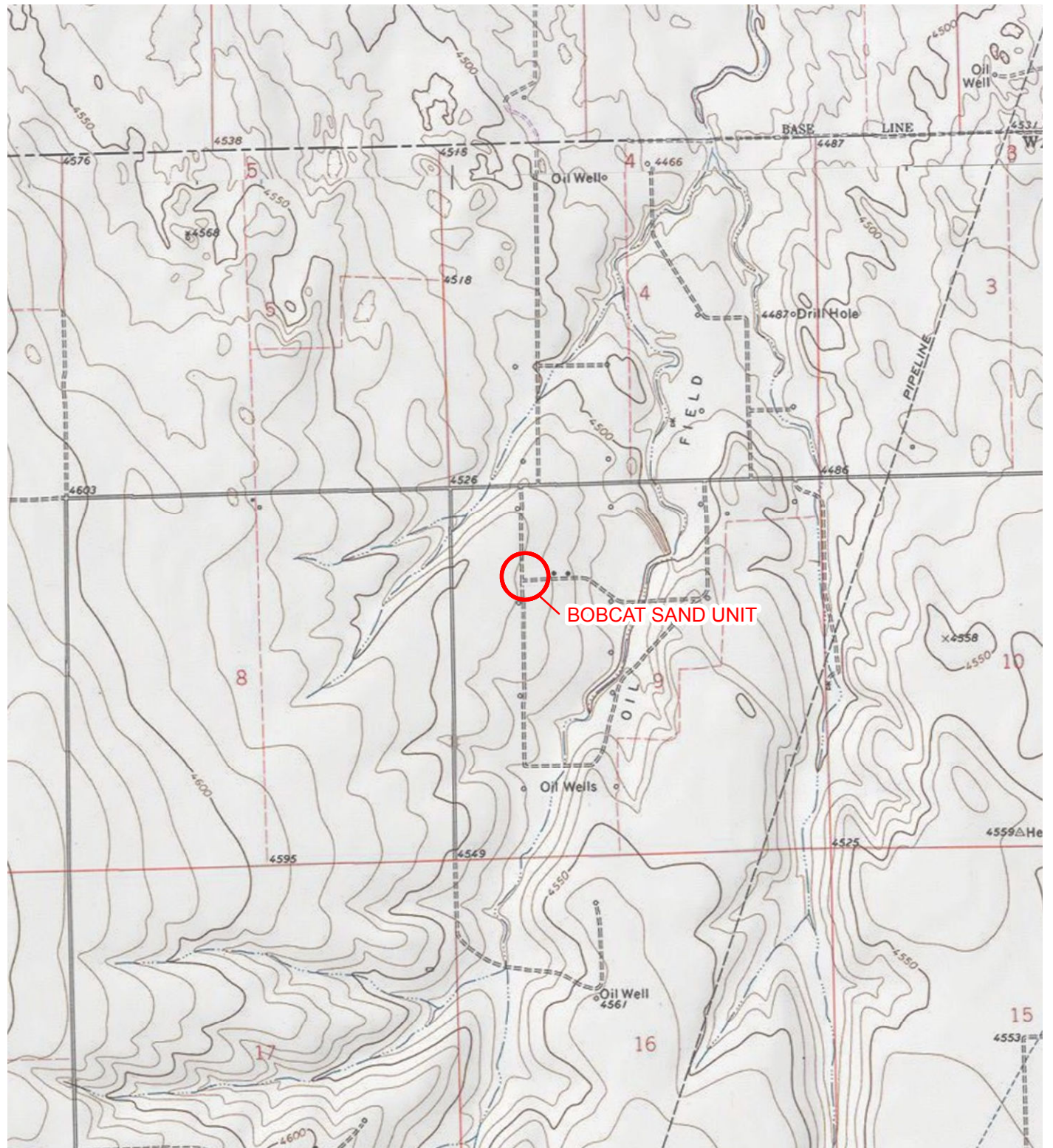


IMAGE COURTESY OF ESRI/USGS

LEGEND

 SITE LOCATION

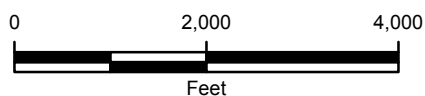


FIGURE 1
SITE LOCATION MAP
BOBCAT SAND UNIT
WASHINGTON COUNTY, COLORADO

WESTERN OPERATING COMPANY



APPENDIX A
COGCC 1000 SERIES RECLAMATION REGULATIONS



RECLAMATION REGULATIONS

1001. INTRODUCTION

- a. **General.** The rules and regulations of this series establish the proper reclamation of the land and soil affected by oil and gas operations and ensure the protection of the topsoil of said land during such operations. The surface of the land shall be restored as nearly as practicable to its condition at the commencement of drilling operations.
- b. **Additional requirements.** Notwithstanding the provisions of the 1000 Series rules, when the Director has reasonable cause to believe that a proposed oil and gas operation could result in a significant adverse environmental impact on any air, water, soil, or biological resource, the Director shall conduct an onsite inspection and may request an emergency meeting of the Commission to address the issue.
- c. **Surface owner waiver of 1000-Series Rules.** The Commission shall not require compliance with Rules 1002. (except Rules 1002.e.(1), 1002.e.(4), and 1002.f, for which compliance will continue to be required), Rule 1003, or Rule 1004 (except Rules 1004.c.(4) and 1004.c.(5), for which compliance will continue to be required), if the operator can demonstrate to the Director's or the Commission's satisfaction both that compliance with such rules is not necessary to protect the public health, safety and welfare, including prevention of significant adverse environmental impacts, and that the operator has entered into an agreement with the surface owner regarding topsoil protection and reclamation of the land. Absent bad faith conduct by the operator, penalties may only be imposed for non-compliance with a Commission order issued after a determination that, notwithstanding such agreement, compliance is necessary to protect public health, safety and welfare. Prior to final reclamation approval as to a specific well, the operator shall either comply with the rules or obtain a variance under Rule 502.b. This rule shall not have the effect of relieving an operator from compliance with the 900 Series Rules.

1002. SITE PREPARATION AND STABILIZATION

- a. Effective June 1, 1996:
 - (1) **Fencing of drill sites and access roads on crop lands.** During drilling operations on crop lands, when requested by the surface owner, the operator shall delineate each drillsite and access road on crop lands constructed after such date by berms, single strand fence, or other equivalent method in order to discourage unnecessary surface disturbances.
 - (2) **Fencing of reserve pit when livestock is present.** During drilling operations where livestock is in the immediate area and is not fenced out by existing fences, the operator, at the request of the surface owner, will install a fence around the reserve pit.
 - (3) **Fencing of well sites.** Subsequent to drilling operations, where livestock is in the immediate area and is not fenced out by existing fences, the operator, at the request of the surface owner, will install a fence around the wellhead, pit, and production equipment to prevent livestock entry.
- b. **Soil removal and segregation.**
 - (1) **Soil removal and segregation on crop land.** As to all excavation operations undertaken after June 1, 1996 on crop land, the operator shall separate and

store soil horizons separately from one another and mark or document stockpile locations to facilitate subsequent reclamation. When separating soil horizons, the operator shall segregate horizons based upon noted changes in physical characteristics such as organic content, color, texture, density, or consistency. Segregation will be performed to the extent practicable to a depth of six (6) feet or bedrock, whichever is shallower.

- (2) **Soil removal and segregation on non crop-land.** As to all excavation operations undertaken after July 1, 1997 on non-crop land, the operator shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper, and mark or document stockpile locations to facilitate subsequent reclamation. When separating the soil horizons, the operator shall segregate the horizon based upon noted changes in physical characteristics such as organic content, color, texture, density, or consistency.
 - (3) **Horizons too rocky or too thin.** When the soil horizons are too rocky or too thin for the operator to practicably segregate, then the topsoil shall be segregated to the extent possible and stored. Too rocky shall mean that the soil horizon consists of greater than thirty five percent (35%) by volume rock fragments larger than ten (10) inches in diameter. Too thin shall mean soil horizons that are less than six (6) inches in thickness. The operator shall segregate remaining soils on crop land to the extent practicable to a depth of three (3) feet below the ground surface or bedrock, whichever is shallower, based upon noted changes in physical characteristics such as color, texture, density or consistency and such soils shall be stockpiled to avoid loss and mixing with other soils.
- c. **Protection of soils.** All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Best management practices to prevent weed establishment and to maintain soil microbial activity shall be implemented.
- d. **Drill pad location.** The drilling location shall be designed and constructed to provide a safe working area while reasonably minimizing the total surface area disturbed. Consistent with applicable spacing orders and well location orders and regulations, in locating drill pads, steep slopes shall be avoided when reasonably possible. The drill pad site shall be located on the most level location obtainable that will accommodate the intended use. If not avoidable, deep vertical cuts and steep long fill slopes shall be constructed to the least percent slope practical. Where feasible, operators shall use directional drilling to reduce cumulative impacts and adverse impacts on wildlife resources.
- e. **Surface disturbance minimization.**
- (1) In order to reasonably minimize land disturbances and facilitate future reclamation, well sites, production facilities, gathering pipelines, and access roads shall be located, adequately sized, constructed, and maintained so as to reasonably control dust and minimize erosion, alteration of natural features, removal of surface materials, and degradation due to contamination.
 - (2) Operators shall avoid or minimize impacts to wetlands and riparian habitats to the degree practicable.
 - (3) Where practicable, operators shall consolidate facilities and pipeline rights-of-way in order to minimize adverse impacts to wildlife resources, including fragmentation of wildlife habitat, as well as cumulative impacts.

- (4) **Access roads.** Existing roads shall be used to the greatest extent practicable to avoid erosion and minimize the land area devoted to oil and gas operations. Roadbeds shall be engineered to avoid or minimize impacts to riparian areas or wetlands to the extent practicable. Unavoidable impacts shall be mitigated. Road crossings of streams shall be designed and constructed to allow fish passage, where practicable and appropriate. Where feasible and practicable, operators are encouraged to share access roads in developing a field. Where feasible and practicable, roads shall be routed to complement other land usage. To the greatest extent practicable, all vehicles used by the operator, contractors, and other parties associated with the well shall not travel outside of the original access road boundary. Repeated or flagrant instance(s) of failure to restrict lease access to lease roads which result in unreasonable land damage or crop losses shall be subject to a penalty under Rule 523.

f. **Stormwater management.**

- (1) All oil and gas locations are subject to the Best Management Practices requirements of Rule 1002.f.(2). In addition, upon the termination of a construction stormwater permit issued by the Colorado Department of Public Health and Environment for an oil and gas location, such oil and gas location is subject to the Post-Construction Stormwater Program requirements of Rule 1002.f.(3), except that such requirements are not applicable to Tier 1 Oil and Gas Locations.
- (2) Oil and gas operators shall implement and maintain Best Management Practices (BMPs) at all oil and gas locations to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation. BMPs shall be maintained until the facility is abandoned and final reclamation is achieved pursuant to Rule 1004. Operators shall employ BMPs, as necessary to comply with this rule, at all oil and gas locations, including, but not limited to, well pads, soil stock piles, access roads, tank batteries, compressor stations, and pipeline rights of way. BMPs shall be selected based on site-specific conditions, such as slope, vegetation cover, and proximity to water bodies, and may include maintaining in-place some or all of the BMPs installed during the construction phase of the facility. Where applicable based on site-specific conditions, operators shall implement BMPs in accordance with good engineering practices, including measures such as:
 - A. **Covering materials and activities and stormwater diversion** to minimize contact of precipitation and stormwater runoff with materials, wastes, equipment, and activities with potential to result in discharges causing pollution of surface waters.
 - B. **Materials handling and spill prevention procedures and practices** implemented for material handling and spill prevention of materials used, stored, or disposed of that could result in discharges causing pollution of surface waters.
 - C. **Erosion controls** designed to minimize erosion from unpaved areas, including operational well pads, road surfaces and associated culverts, stream crossings, and cut/fill slopes.
 - D. **Self-inspection, maintenance, and good housekeeping procedures and schedules** to facilitate identification of conditions that could cause breakdowns or failures of BMPs. These procedures shall include measures for maintaining clean, orderly operations and facilities and shall address cleaning and maintenance schedules and waste disposal

practices. In conducting inspections and maintenance relative to stormwater runoff, operators shall consider seasonal factors, such as winter snow cover and spring runoff from snowmelt, to ensure site conditions and controls are adequate and in place to effectively manage stormwater.

- E. **Spill response procedures** for responding to and cleaning up spills. The necessary equipment for spill cleanup shall be readily available to personnel. Spill Prevention, Control, and Countermeasure plans incorporated by reference must be identified in the Post-Construction Stormwater Management Program specified in Rule 1002.f.(3).
 - F. **Vehicle tracking control practices** to control potential sediment discharges from operational roads, well pads, and other unpaved surfaces. Practices could include road and pad design and maintenance to minimize rutting and tracking, controlling site access, street sweeping or scraping, tracking pads, wash racks, education, or other sediment controls.
- (3) Operators of oil and gas facilities shall develop a Post-Construction Stormwater Program in compliance with this section no later than the time of termination of stormwater permits issued by the Colorado Department of Public Health and Environment for construction of oil and gas facilities.
- A. The Post-Construction Stormwater Program shall reflect good faith efforts by operators to select and implement BMPs intended to serve the purposes of this rule. BMPs shall be selected to address potential sources of pollution which may reasonably be expected to affect the quality of discharges associated with the ongoing operation of production facilities during the post-construction and reclamation operation of the facilities. Pollutant sources that must be addressed by BMPs, if present, include:
 - i. Transport of chemicals and materials, including loading and unloading operations;
 - ii. Vehicle/equipment fueling;
 - iii. Outdoor storage activities, including those for chemicals and additives;
 - iv. Produced water and drilling fluids storage;
 - v. Outdoor processing activities and machinery;
 - vi. Significant dust or particulate generating processes;
 - vii. Erosion and vehicle tracking from well pads, road surfaces, and pipelines;
 - viii. Waste disposal practices;
 - ix. Leaks and spills; and
 - x. Ground-disturbing maintenance activities.

- B. The Post-Construction Stormwater Program shall be developed, supervised, documented, and maintained by a qualified person(s) with training or prior work experience specific to stormwater management. Employees and subcontractors shall be trained to make them aware of the BMPs implemented and maintained at the site and procedures for reporting needed maintenance or repairs. Documentation shall include a description of the BMPs selected to ensure proper implementation, operation, and maintenance.
- C. Facility-specific maps, installation specification, and implementation criteria shall also be included when general operating procedures and descriptions are not adequate to clearly describe the implementation and operation of BMPs.

1003. INTERIM RECLAMATION

- a. **General.** Debris and waste materials other than de minimis amounts, including, but not limited to, concrete, sack bentonite and other drilling mud additives, sand plastic, pipe and cable, as well as equipment associated with the drilling, re-entry, or completion operations shall be removed. All E&P waste shall be handled according to the 900 Series rules. All pits, cellars, rat holes, and other bore holes unnecessary for further lease operations, excluding the drilling pit, will be backfilled as soon as possible after the drilling rig is released to conform with surrounding terrain. On crop land, if requested by the surface owner, guy line anchors shall be removed as soon as reasonably possible after the completion rig is released. When permanent guy line anchors are installed, it shall not be mandatory to remove them. When permanent guy line anchors are installed on cropland, care shall be taken to minimize disruption or cultivation, irrigation, or harvesting operations. If requested by the surface owner or its representative, the anchors shall be specifically marked, in addition to the marking required below, so as to facilitate farming operations. All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor. In addition, all well sites and surface production facilities shall be maintained in accordance with Rule 603.j.
- b. **Interim reclamation of areas no longer in use.** All disturbed areas affected by drilling or subsequent operations, except areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use as designated by the surface owner and shall be maintained to control dust and minimize erosion to the extent practicable. As to crop lands, if subsidence occurs in such areas additional topsoil shall be added to the depression and the land shall be re-leveled as close to its original contour as practicable. Interim reclamation shall occur no later than three (3) months on crop land or six (6) months on non-crop land after such operations unless the Director extends the time period because of conditions outside the control of the operator. Areas reasonably needed for production operations or for subsequent drilling operations to be commenced within twelve (12) months shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.
- c. **Compaction alleviation.** All areas compacted by drilling and subsequent oil and gas operations which are no longer needed following completion of such operations shall be cross-ripped. On crop land, such compaction alleviation operations shall be undertaken when the soil moisture at the time of ripping is below thirty-five percent (35%) of field capacity. Ripping shall be undertaken to a depth of eighteen (18) inches unless and to the extent bed rock is encountered at a shallower depth.

d. **Drilling pit closure.** As part of interim reclamation, drilling pits shall be closed in the following manner:

(1) **Drilling pit closure on crop land and within 100-year floodplain.** On crop land or within the 100-year floodplain, water-based bentonitic drilling fluids, except *de minimis* amounts, shall be removed from the drilling pit and disposed of in accordance with the 900 Series rules. Operators shall ensure that soils meet the concentration levels of Table 910-1, above. Drilling pit reclamation, including the disposal of drilling fluids and cuttings, shall be performed in a manner so as to not result in the formation of an impermeable barrier. Any cuttings removed from the pit for drying shall be returned to the pit prior to backfilling, and no more than *de minimis* amounts may be incorporated into the surface materials. After the drilling pit is sufficiently dry, the pit shall be backfilled. The backfilling of the drilling pit shall be done to return the soils to their original relative positions. Closing and reclamation of drilling pits shall occur no later than three (3) months after drilling and completion activities conclude.

(2) **Drilling pit closure on non-crop land.** All drilling fluids shall be disposed of in accordance with the 900 Series rules. Operators shall ensure that soils meet the concentration levels of Table 910-1, above. After the drilling pit is sufficiently dry, the pit shall be backfilled. Materials removed from the pit for drying shall be returned to the pit prior to the backfilling. No more than *de minimis* amounts may be incorporated into the surface materials. The backfilling of the drilling pit will be done to return the soils to their original relative positions so that the muds and associated solids will be confined to the pit and not squeezed out and incorporated in the surface materials. Closure and reclamation of drilling pits shall occur no later than six (6) months after drilling and completion activities conclude, weather permitting.

(3) **Minimum cover.** On crop lands, a minimum of three (3) feet of backfill cover shall be applied over any remaining drilling pit contents. As to both crop lands and non-crop lands, during the two (2) year period following drilling pit closure, if subsidence occurs over the closed drilling pit location additional topsoil shall be added to the depression and the land shall be re-leveled as close to its original contour as practicable.

e. **Restoration and revegetation.** When a well is completed for production, all disturbed areas no longer needed will be restored and revegetated as soon as practicable.

(1) **Revegetation of crop lands.** All segregated soil horizons removed from crop lands shall be replaced to their original relative positions and contour, and shall be tilled adequately to re-establish a proper seedbed. The area shall be treated if necessary and practicable to prevent invasion of undesirable species and noxious weeds, and to control erosion. Any perennial forage crops that were present before disturbance shall be re-established.

(2) **Revegetation of non-crop lands.** All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability, and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be reseeded in the first favorable season following rig demobilization. Reseeding with species consistent with the adjacent plant community is encouraged. In the absence of an agreement between the operator and the affected surface owner as to what seed mix should be used, the operator shall consult with a representative of the local soil conservation district to determine the proper seed mix to use in revegetating the disturbed area. In an area where

an operator has drilled or plans to drill multiple wells, in the absence of an agreement between the operator and the affected surface owner, the operator may rely upon previous advice given by the local soil conservation district in determining the proper seed mixes to be used in revegetating each type of terrain upon which operations are to be conducted.

Interim reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and all disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance levels or reference areas, excluding noxious weeds. Re-seeding alone is not sufficient.

- (3) **Interim reclamation completion notice, Form 4.** The operator shall submit a Sundry Notice, Form 4, which describes the interim reclamation procedures and any associated mitigation measures performed, any changes, if applicable in the landowner's designated final land use, and at a minimum four (4) photographs taken during the growing season facing each cardinal direction which document the success of the interim reclamation and one (1) photograph which documents the total cover of live perennial vegetation of adjacent or nearby undisturbed land or the reference area. Each photograph shall be identified by date taken, well name, GPS location, and direction of view.

- f. **Weed control.** During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Weed control measures shall be conducted in compliance with the Colorado Noxious Weed Act, C.R.S. §35-5.5-115 and the current rules pertaining to the administration and enforcement of the Colorado Noxious Weed Act. It is recommended that the operator consult with the local weed control agency or other weed control authority when weed infestation occurs. It is the responsibility of the operator to monitor affected and reclaimed lands for noxious weed infestations. If applicable, the Director may require a weed control plan.

1004. FINAL RECLAMATION OF WELL SITES AND ASSOCIATED PRODUCTION FACILITIES

- a. **Well sites and associated production facilities.** Upon the plugging and abandonment of a well, all pits, mouse and rat holes and cellars shall be backfilled. All debris, abandoned gathering line risers and flowline risers, and surface equipment shall be removed within three (3) months of plugging a well. All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and recontoured. Culverts and any other obstructions that were part of the access road(s) shall be removed. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. The burning or burial of such material on the premises shall be performed in accordance with applicable local, state, or federal solid waste disposal regulations and in accordance with the 900-Series Rules. In addition, material may be burned or buried on the premises only with the prior written consent of the surface owner. All such reclamation work shall be completed within three (3) months on crop land and twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities. The Director may grant an extension where

unusual circumstances are encountered, but every reasonable effort shall be made to complete reclamation before the next local growing season.

- b. **Production and special purpose pit closure.** The operator shall comply with the 900 series rules for the removal or treatment of E&P waste remaining in a production or special purpose pit before the pit may be closed for final reclamation. After any remaining E&P waste is removed or treated, all such pits must be back-filled to return the soils to their original relative positions. As to both crop lands and non-crop lands, if subsidence occurs over closed pit locations, additional topsoil shall be added to the depression and the land shall be re-leveled as close to its original contour as practicable.
- c. **Final reclamation threshold for release of financial assurance.** Successful reclamation of the well site and access road will be considered completed when:
- (1) On crop land, reclamation has been performed as per Rules 1003 and 1004, and observation by the Director over two growing seasons has indicated no significant unrestored subsidence.
 - (2) On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal. The Director shall consider the total cover of live perennial vegetation of adjacent or nearby undisturbed land, not including overstory or tree canopy cover, having similar soils, slope and aspect of the reclaimed area.
 - (3) Disturbances resulting from flow line installations shall be deemed adequately reclaimed when the disturbed area is reasonably capable of supporting the pre-disturbance land use.
 - (4) A Sundry Notice Form 4, has been submitted by the operator which describes the final reclamation procedures, any changes, if applicable, in the landowner's designated final land use, and any mitigation measures associated with final reclamation performed by the operator, and
 - (5) A final reclamation inspection has been completed by the Director, there are no outstanding compliance issues relating to Commission rules, regulations, orders, permit conditions or the act, and the Director has notified the operator that final reclamation has been approved.
- d. Final reclamation of all disturbed areas shall be considered complete when all activities disturbing the ground have been completed, and all disturbed areas have been either built upon, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, or equivalent permanent, physical erosion reduction methods have been employed. Re-seeding alone is not sufficient.
- e. **Weed control.** All areas being reclaimed shall be kept as free as practicable of all undesirable plant species designated to be noxious weeds. Weed control measures shall be conducted in compliance with the Colorado Noxious Weed Act, C.R.S. §35-5.5-115 and

the current rules pertaining to the administration and enforcement of the Colorado Noxious Weed Act. It is recommended that the operator consult with the local weed control agency or other weed control authority when weed infestation occurs. It is the responsibility of the operator to monitor affected and reclaimed lands for noxious weed infestations. If applicable, the Director may require a weed control plan.

APPENDIX B
LANDOWNER SEED MIX RECOMMENDATIONS



January 4, 2016

**RE: Grass Seed Mix Landowner Notification and Approval
Western Operating Company
Bobcat Sand Unit
Washington County, Colorado**

Dear Mr. Query:

The Colorado Oil and Gas Conservation Commission (COGCC) has requested Western Operating Company (WOC) inform the Surface Owner of the grass seed mix anticipated for use in reclamation activities at the above referenced location in spring of 2016.

Signature

If you agree with the grass seed mix for use on the location referenced above, please sign below. If you have any additional comments as to the seed mix to be used please use Attachment B to do so.

Surface Owner Name (Print): Virgil Query Trust by Daniel A Query

Surface Owner Signature: Daniel A Query

Date: 1-7-16

Sincerely,

WESTERN OPERATION COMPANY..

- Attachment A Seed Mix
- Attachment B Surface Owner Comments

SHARP'S DRYLAND PASTURE MIX

LOT # : G-130434

Mixture/Variety:	Purity %	Germ%	Origin:
DAHURIAN WILD RYE, VNS	24.49	98	CAN
INTERMEDIATE WHEATGRASS, RUSH	19.03	98	WY
ORCHARDGRASS, PROFILE	18.97	97	OR
FORAGE PER. RYEGRASS, ALBION	18.74	96	OR
SMOOTH BROME, VNS	14.54	96	KS

Crop: 1.39 % Inert: 2.73 % Weeds: 0.11 % Net Wt. 50.0 #

Noxious Weeds: NONE FOUND

Tested: MARCH 2013

Sharp Bros. Seed Co.

Not the Biggest... Simply the Best!

Sharp Bros. Seed Co. Greeley, CO 80631 (970) 356-4710

Appendix B

Bobcat Sand Unit
Washington County, Colorado



APPENDIX C
COGCC FIELD INSPECTION FORM



Inspector Name: Trujillo, Aaron

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:
12/07/2015

Document Number:
682500200

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	435387	435387	Trujillo, Aaron	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	95620
Name of Operator:	WESTERN OPERATING COMPANY
Address:	518 17TH ST STE 200
City:	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
James, Steve	(303) 893-2438	s.d.james@worldnet.att.net	All Inspections
James, Steve	(303) 893-2438	steve@westernoperating.com	President
Hart, Dale	(719) 729-3391	dalehartwoc@fairpoint.net	All Inspections

Compliance Summary:

QtrQtr:	CNW	Sec:	9	Twp:	1S	Range:	56W
Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
11/09/2015	682500090			ACTION REQUIRED			No

Inspector Comment:

This is a follow up, stormwater and location inspection. Any corrective actions from previous inspections that have not been addressed are still applicable.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
435386	TANK BATTERY	AC	12/12/2013		-	Bobcat Sand Unit Battery 435386	AC
435389	TANK BATTERY	AC	12/12/2013		-	Bobcat Sand Unit Battery 435386	AC

Equipment:

Location Inventory

Special Purpose Pits:	Drilling Pits:	Wells:	Production Pits:
Condensate Tanks:	Water Tanks: 2	Separators: 3	Electric Motors:
Gas or Diesel Mortors:	Cavity Pumps: 1	LACT Unit:	Pump Jacks:
Electric Generators:	Gas Pipeline:	Oil Pipeline:	Water Pipeline:
Gas Compressors:	VOC Combustor:	Oil Tanks: 3	Dehydrator Units:
Multi-Well Pits:	Pigging Station:	Flare:	Fuel Tanks:

Location

Emergency Contact Number (S/AV):

Corrective Date:

Inspector Name: Trujillo, Aaron

Comment:

Corrective Action:

Good Housekeeping:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date
OTHER	ACTION REQUIRED	Door to box-framed, subsurface structure damaged in Northwest corner of location. See "COGCC Comments".	Properly repair door and cover subsurface structure. Original CA date of November 30th, 2015 remains in place	11/30/2015
TRASH	ACTION REQUIRED	Trash debris located on pit and battery location. See "COGCC Comments".	Properly remove and dispose of trash debris, original CA date of November 30th, 2015 remains in place.	11/30/2015
DEBRIS	ACTION REQUIRED	Kochia and Russian thistle weed debris located throughout pit and battery location. See "COGCC Comments".	Properly remove and dispose of weed debris. Original CA date of November 30th, 2015 remains in place	11/30/2015

Spills:				
Type	Area	Volume	Corrective action	CA Date

Multiple Spills and Releases?

Venting:	
Yes/No	Comment

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

Inspector Name: Trujillo, Aaron

Predrill

Location ID: 435387

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: 0 Type: _____ API Number: - Status: _____ Insp. Status: _____

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

Inspector Name: Trujillo, Aaron

	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 _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation _____

Inspector Name: Trujillo, Aaron

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/AV: **ACTION REQUIRED** Corrective Date: **12/07/2015**

Comment: **Stormwater erosion occurring on battery and pit location. See "COGCC Comments"**

CA: **Ensure stormwater BMPs are installed and maintained to control erosion. Original CA date of 12/07/2015 remains in place.**

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Kochia (Kochia sp.) and Russian thistle (Salsola sp.) located within project area and along fenceline. This is debris and will break and encroach upon adjacent lands. Please see figures 1, 2, 3, 8, 10 and 29 in the attached photo document.	trujilloam	12/08/2015
Remove and properly dispose of weed debris. Original CA date of Nov. 30, 2015 remain in effect.		
Trash debris located on eastern end of location. Please refer to figures 13, 14, 15 and 30 in the attached photo document.	trujilloam	12/08/2015
Properly remove and dispose of trash, and any other trash debris within location. Original CA date of Nov. 30, 2015 remains in effect.		
Door to box-framed, subsurface structure damaged in Northwest corner of location. Please refer to figures 9 and 10 in the attached photo document.	trujilloam	12/08/2015
This exposed structure poses a hazard to wildlife and human safety.		
Properly repair door and cover subsurface structure. Original CA date of November 30th, 2015 remains in effect.		

Inspector Name: Trujillo, Aaron

<p>Insufficient stormwater mitigation measures in place on BATTERY LOCATION. Stormwater channels forming and erosion issues located throughout entirety of location. This is strongly evident on eastern end of location where gully formations are developing and sediment is encroaching upon adjacent lands off project area. Refer to figures 1,2,4, 5-7, 11,12 and 16 in the attached photo document.</p> <p>Ensure sufficient stormwater BMPs are installed and properly maintained to mitigate and control high water energy, stormwater erosion and runoff sedimentation. Original CA date of December 7th, 2015 remains in effect.</p>	trujilloam	12/08/2015
<p>Insufficient stormwater mitigation measures in place on PIT LOCATION.</p> <p>Rill erosion evident throughout perimeter of pit with stormwater runoff sedimentation encroaching upon adjacent lands. Pit containment berm appears to be pourous, poorly compacted and stormwater is flowing both on and through the containment berm. Refer to figures 17-29 in the attached photo document.</p> <p>Ensure sufficient stormwater BMPs are installed and properly maintained to control stormwater erosion and runoff sedimentation of the pit location.</p> <p>Original CA date of December 7th, 2015 remains in effect.</p> <p>Multiple stormwater BMPs may be needed.</p>	trujilloam	12/08/2015

Attached Documents

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

Document Num	Description	URL
682500201	Follow-up Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3736750

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.)

Inspector Name: QUINT, CRAIG

**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:
12/02/2014

Document Number:
668603249

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	<input type="checkbox"/>
	<u>234485</u>	<u>317013</u>	<u>QUINT, CRAIG</u>	2A Doc Num:	

Operator Information:

OGCC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 518 17TH ST STE 200

City: 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
Arthur, Denise		denise.arthur@state.co.us	
JAMES, STEVEN D	303-893-2438 Office	steve@westernoperating.com	President

Compliance Summary:

QtrQtr: NENW Sec: 9 Twp: 1S Range: 56W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
03/31/2004	200052296	MT	TA	SATISFACTORY		Pass	No
07/17/1997	500158705	ID	TA			Pass	No
03/15/1996	500158704		TA			Pass	No

Inspector Comment:

All disturbed areas must be decompacted, have a good seedbed prepared, and then seeded by spring 2015 with a seed mixture that matches the adjacent pastureland or a seed mixture requested by the landowner. After seeding erosion controls must be implemented that stabilizes the seeded soil, e.g. a type of mulch.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
234485	WELL	SI	08/13/2010	OW	121-06608	BOBCAT D SAND UNIT 14	SI

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/AV): _____

Corrective Date: _____

Inspector Name: QUINT, CRAIG

Comment:	
Corrective Action:	

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

Venting:		
Yes/No	Comment	

Flaring:				
Type	Satisfactory/Action Required	Comment	Corrective Action	CA Date

--	--	--	--	--

Inspector Name: QUINT, CRAIG

Predrill

Location ID: 234485

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:

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

DWR Receipt Num: _____ Owner Name: _____ GPS: _____ Lat _____ Long _____

Field Parameters:

Inspector Name: QUINT, CRAIG

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 _____

1003 f. Weeds Noxious weeds? _____

Comment: _____

Overall Interim Reclamation _____

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: _____

Inspector Name: QUINT, CRAIG

Reminder:

Comment: _____

Well plugged Pass Pit mouse/rat holes, cellars backfilled Pass

Debris removed Pass No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed In Locations, facilities, roads, recontoured In

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% In Cropland: perennial forage _____

Weeds present In Process Subsidence In

Comment: **WELL WAS P&A ON 1/17/2014, WELLHEAD HAS BEEN CUT, CAPPED AND COVERED, REA POLES ARE ON SITE BUT MIGHT STILL BE IN USE. AREA WEST OF LOCATION SHOWS LITTLE VEGETATION GROWTH (A POSSIBLE FLOWLINE LEAK IN THE PAST).**

Corrective Action: **RECLAIM LOCATION AND ACCESS. (SEE COMMENTS ON FIRST AND LAST PAGE OF THIS INSPECTION).** Date **03/02/2015**

Overall Final Reclamation In Process 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/AV: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
All disturbed areas must be decompacted, have a good seedbed prepared, and then seeded by spring 2015 with a seed mixture that matches the adjacent pastureland or a seed mixture requested by the landowner. After seeding erosion controls must be implemented that stabilizes the seeded soil, e.g. a type of mulch.	quintc	12/03/2014

Attached Documents

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

Document Num	Description	URL
668603253	BACK GROUND	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497875
668603254	LOCATION LOOKING EAST	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497876
668603255	DEAD AREA	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3497877

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.)

Inspector Name: Trujillo, Aaron

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:
11/09/2015

Document Number:
682500087

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	234485	317013	Trujillo, Aaron	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 518 17TH ST STE 200

City: 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
Hart, Dale	(719) 729-3391	dalehartwoc@fairpoint.net	All Inspections
James, Steve	(303) 893-2438	s.d.james@worldnet.att.net	All Inspections

Compliance Summary:

QtrQtr: NENW Sec: 9 Twp: 1S Range: 56W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
12/02/2014	668603249	SI	SI	ACTION REQUIRED		I	No
03/31/2004	200052296	MT	TA	SATISFACTORY		Pass	No
07/17/1997	500158705	ID	TA			Pass	No
03/15/1996	500158704		TA			Pass	No

Inspector Comment:

This is a final reclamation inspection.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
234485	WELL	PA	01/07/2014	OW	121-06608	BOBCAT D SAND UNIT 14	PA <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/AV): _____

Corrective Date: _____

Inspector Name: Trujillo, Aaron

Predrill

Location ID: 234485

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: 234485 Type: WELL API Number: 121-06608 Status: PA Insp. Status: PA

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

Inspector Name: Trujillo, Aaron

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 **Fail** No disturbance /Location never built _____

Access Roads Regraded _____ Contoured _____ Culverts removed _____

Gravel removed **Fail**

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation _____ Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present _____ Subsidence _____

Comment: **See "COGCC Comments"**

Corrective Action: **Provide reclamation plan as outlined in "COGCC Comments".** Date **12/15/2015**

Overall Final Reclamation **Fail** 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/AV: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Debris remains on location, refer to photos 3, 4 and 5 in attached documents. This needs to be removed prior to revegetation activities.	trujilloam	11/11/2015
Unable to find evidence of any management activities as required by inspection document #668603249.	trujilloam	11/11/2015
Vegetation encroaching on site is predominantly weeds such as Canada Horseweed (Coryza canadensis), Russian thistle (Salsola sp.) and Kochia (Kochia sp.).		
Location does not meet reclamation regulations. Submit a Form 4 including a detailed reclamation plan to revegetate the area by CA date of December 15, 2015. Plan must include at a minimum a weed management plan, fertilizer/soil amendments (if needed), NRCS or landowner approved seed mixture, seed application method, specific timing (with date ranges), mulch type, water (if needed) and monitoring efforts.	trujilloam	11/11/2015
Revegetation activities shall begin no later than CA date of March 31 2016.		

Inspector Name: Trujillo, Aaron

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:
11/09/2015

Document Number:
682500088

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	<u>234481</u>	<u>317011</u>	<u>Trujillo, Aaron</u>	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number: 95620
 Name of Operator: WESTERN OPERATING COMPANY
 Address: 518 17TH ST STE 200
 City: 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
James, Steve	(303) 893-2438	s.d.james@worldnet.att.net	All Inspections
Hart, Dale	(719) 729-3391	dalehartwoc@fairpoint.net	All Inspections

Compliance Summary:

QtrQtr: NWNE Sec: 9 Twp: 1S Range: 56W

Insp. Date	Doc Num	Insp. Type	Insp Status	Satisfactory /Action Required	PA P/F/I	Pas/Fail (P/F)	Violation (Y/N)
12/02/2014	668603246	SI	PA	ACTION REQUIRED		I	No
03/31/2004	200052305	MT	TA	SATISFACTORY		Pass	No
03/17/2003	200036504	ID	SI	ACTION REQUIRED		Fail	Yes
07/17/1997	500158702	ID	TA			Pass	No
03/15/1996	500158701		TA			Pass	No

Inspector Comment:

This is a final reclamation inspection.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status	
234481	WELL	PA	01/24/2014	OW	121-06604	BOBCAT D SAND UNIT 13	PA	<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

Inspector Name: Trujillo, Aaron

Predrill

Location ID: 234481

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: 234481 Type: WELL API Number: 121-06604 Status: PA Insp. Status: PA

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

Inspector Name: Trujillo, Aaron

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% **Fail** Cropland: perennial forage _____

Weeds present _____ Subsidence _____

Comment: **See "COGCC Comments"**

Corrective Action: **Provide reclamation plan as outlined in "COGCC Comments".** Date **12/15/2015**

Overall Final Reclamation **Fail** 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/AV: _____ Corrective Date: _____

Comment: _____

CA: _____

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Inadequate perennial vegetation. Please see attached photos.	trujilloam	11/11/2015
Location does not meet reclamation regulations. Submit a Form 4 including a detailed reclamation plan to revegetate the area by CA date of December 15, 2015. Plan must include at a minimum a weed management plan, fertilizer/soil amendments (if needed), NRCS or landowner approved seed mixture, seed application method, specific timing (with date ranges), mulch type, water (if needed) and monitoring efforts.	trujilloam	11/11/2015
Revegetation activities shall begin no later than CA date of March 31 2016.		

Attached Documents

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

Document Num	Description	URL
682500089	Reclamation inspection photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=3719804

Inspector Name: Trujillo, Aaron

**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:
11/09/2015

Document Number:
682500090

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	435387	435387	Trujillo, Aaron	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number:	95620
Name of Operator:	WESTERN OPERATING COMPANY
Address:	518 17TH ST STE 200
City:	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
Hart, Dale	(719) 729-3391	dalehartwoc@fairpoint.net	All Inspections
James, Steve	(303) 893-2438	s.d.james@worldnet.att.net	All Inspections

Compliance Summary:

QtrQtr: CNW Sec: 9 Twp: 1S Range: 56W

Inspector Comment:

This is a stormwater and location inspection.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
435386	TANK BATTERY	AC	12/12/2013		-	Bobcat Sand Unit Battery 435386	AC
435389	TANK BATTERY	AC	12/12/2013		-	Bobcat Sand Unit Battery 435386	AC

Equipment:

Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	Production Pits: <u>1</u>
Condensate Tanks: _____	Water Tanks: <u>2</u>	Separators: <u>3</u>	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: <u>1</u>	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: <u>3</u>	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

Location

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

Corrective Date: _____

Comment: _____

Corrective Action: _____

Inspector Name: Trujillo, Aaron

Predrill

Location ID: 435387

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: 0 Type: _____ API Number: - Status: _____ Insp. Status: _____

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

Inspector Name: Trujillo, Aaron

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/AV: **ACTION REQUIRED** Corrective Date: **12/07/2015**

Comment: **Stormwater erosion occurring on location. See "COGCC Comments"**

CA: **Ensure strom water BMPs are installed and maintained to control erosion by CA date of 12/07/2015.**

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
All adjacent lands that are disturbed due to inadequate BMPs related to the location, and any related disturbances required by this location to service near-by sites (i.e. gathering lines, flowlines) need to be reclaimed. Refer to photos 17-27 in attached photo document.	trujilloam	11/13/2015
Submit a Form 4 with an attached reclamation plan to reclaim disturbed areas by CA date of December 20, 2015. The plan should include a minimum of a detailed schedule for reclamation activities, stormwater and management, weed management plan, seed mixture, seed application method, mulch type, and if needed, fertilizer/soil amendments.		
Revegetation activities to disturbed areas shall begin no later than March 31, 2016		

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.)

Inspector Name: Trujillo, Aaron

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:
11/09/2015

Document Number:
682500090

Overall Inspection:

ACTION REQUIRED

FIELD INSPECTION FORM

Location Identifier	Facility ID	Loc ID	Inspector Name:	On-Site Inspection	2A Doc Num:
	435387	435387	Trujillo, Aaron	<input type="checkbox"/>	

Operator Information:

OGCC Operator Number: 95620
 Name of Operator: WESTERN OPERATING COMPANY
 Address: 518 17TH ST STE 200
 City: 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
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James, Steve	(303) 893-2438	s.d.james@worldnet.att.net	All Inspections

Compliance Summary:

QtrQtr: CNW Sec: 9 Twp: 1S Range: 56W

Inspector Comment:

This is a stormwater and location inspection.

Related Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
435386	TANK BATTERY	AC	12/12/2013		-	Bobcat Sand Unit Battery 435386	AC
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Equipment:

Location Inventory

Special Purpose Pits: _____	Drilling Pits: _____	Wells: _____	Production Pits: 1
Condensate Tanks: _____	Water Tanks: 2	Separators: 3	Electric Motors: _____
Gas or Diesel Mortors: _____	Cavity Pumps: 1	LACT Unit: _____	Pump Jacks: _____
Electric Generators: _____	Gas Pipeline: _____	Oil Pipeline: _____	Water Pipeline: _____
Gas Compressors: _____	VOC Combustor: _____	Oil Tanks: 3	Dehydrator Units: _____
Multi-Well Pits: _____	Pigging Station: _____	Flare: _____	Fuel Tanks: _____

Location

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

Comment: _____

Corrective Action: _____

Inspector Name: Trujillo, Aaron

Predrill

Location ID: 435387

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: 0 Type: _____ API Number: - Status: _____ Insp. Status: _____

Environmental

Spills/Releases:

Type of Spill: _____ Description: _____ Estimated Spill Volume: _____

Comment: _____

Corrective Action: _____ Date: _____

Reportable: _____ GPS: Lat _____ Long _____

Proximity to Surface Water: _____ Depth to Ground Water: _____

Water Well:

Inspector Name: Trujillo, Aaron

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/AV: **ACTION REQUIRED** Corrective Date: **12/07/2015**

Comment: **Stormwater erosion occurring on location. See "COGCC Comments"**

CA: **Ensure strom water BMPs are installed and maintained to control erosion by CA date of 12/07/2015.**

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>All adjacent lands that are disturbed due to inadequate BMPs related to the location, and any related disturbances required by this location to service near-by sites (i.e. gathering lines, flowlines) need to be reclaimed. Refer to photos 17-27 in attached photo document.</p> <p>Submit a Form 4 with an attached reclamation plan to reclaim disturbed areas by CA date of December 20, 2015. The plan should include a minimum of a detailed schedule for reclamation activities, stormwater and management, weed management plan, seed mixture, seed application method, mulch type, and if needed, fertilizer/soil amendments.</p> <p>Revegetation activities to disturbed areas shall begin no later than March 31, 2016</p>	trujilloam	11/13/2015

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.)

APPENDIX D
TJS YARDS INVOICE





TJS Yards LLC
 PO Box 476
 Akron, Co. 80720

Invoice

Date	Invoice #
4/27/2015	1300

tjsyards@live.com

Western Operating Company
 200 Denver Club Building
 518 17th St.
 Denver, Co. 80202

POSTED
 04/15
 V#450

Lease Name or Job Site
Bobcat

Item	Description	Qty	Rate	Amount
	BOBCAT - reseeding of locations - plugged wells and where injection lines were repaired			
	4/23/2014 ; prepared plugged locations for reseeding - cleaned up concrete etc.			
Equipment Labor	Service Truck/Tools/Trailer	5	75.00	375.00
Equipment Labor	Service Truck/Tools/Trailer	5	75.00	375.00
Tractor	JD Tractor	5	150.00	750.00
JD Skidsteer	JD Skidsteer	5	95.00	475.00
	4/24/2015 ; Seeded all locations and spread straw and crimped some locations			
Equipment Labor	Service Truck/Tools/Trailer	9	75.00	675.00
Reclamation	JD Tractor w/Implements	9	150.00	1,350.00
	4/28/2015 ; Finished spreading of straw and crimping, moved processor home			
Equipment Labor	Service Truck/Tools/Trailer	6	75.00	450.00
Reclamation	JD Tractor w/Implements	6	150.00	900.00
Straw	Straw bales used Straw Bales	7	150.00	1,050.00
Thank you for your business. FedID#26-3848842			Total	\$6,400.00

J. Crumley