

**FORM
INSP**Rev
X/15**State of Colorado
Oil and Gas Conservation Commission**1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

10/04/2018

Submitted Date:

10/05/2018

Document Number:

682503985**FIELD INSPECTION FORM**
 Loc ID 312292 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
Operator Information:OGCC Operator Number: 95620Name of Operator: WESTERN OPERATING COMPANYAddress: 1165 DELAWARE STREET #200City: DENVER State: CO Zip: 80204**Status Summary:**

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:4 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**Contact Information:**

Contact Name	Phone	Email	Comment
		tcrumley@comcast.net	
Arthur, Denise		denise.arthur@state.co.us	
		steve@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	RI

General Comment:

This is a follow-up interim reclamation and stormwater inspection to doc. #675103909 dated 08/25/2017, #682502714 dated 10/18/2017, #682502925 dated 12/07/2017, #682503171 dated 02/26/2018, and #682503225 dated 04/10/2018, and #682503670 dated 7/31/2018.

This is also a follow-up inspection in response to a notification by the contractor stating work would completed by end of week.

Any corrective actions from previous inspections that have not been addressed are still applicable.

Inspected Facilities				
Facility ID: 221086	Type: WELL	API Number: 075-09212	Status: PR	Insp. Status: RI
Producing Well				
Comment:	PR well, Interim Rec. and Stormwater inspection			
Corrective Action:				Date:

Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? _____

Comment _____

Corrective Action _____

Date _____

Pit, cellars, rat holes and other bores closed? _____

Comment _____

Corrective Action _____

Date _____

Guy line anchors marked? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? FailProduction areas stabilized ? Fail

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 REVEGETATIONCropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-Cropland

Top soil replaced _____

Recontoured _____

80% Revegetation _____

1003e. INTERIM VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

1003 f. Weeds Noxious weeds? _____

Comment

The previous six (6) inspections required operator to perform remediation/reclamation and stabilize areas downgrade of the produced water pit experiencing substantial and ongoing erosion by 11/15/2017. See Remediation project #10266, and supplemental form 27 #401414059 for additional information. Previous inspections documented that Operator re-graded and seeded the disturbed areas. It was also documented that Operator has failed to implement REQUIRED stabilization and stormwater control BMPs. Erosion degradation has been allowed to continue over the re-graded disturbance areas, and will need to be repaired, stabilized and reclaimed. This corrective action will remain in place and applicable until it has been addressed in its entirety.

Corrective Action

Perform remediation/reclamation and implement/maintain stabilization BMPs until 910-1 standards are met, at which point revegetation/reclamation activities shall be conducted in accordance to COGCC reclamation standards; Re-grade disturbed areas and establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until reclamation has passed. Remediation/reclamation activities shall be conducted no later than 11/15/2017.

Date 11/15/2018Overall Interim Reclamation Fail**Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: _____

Date Final Reclamation Completed: _____

Final Land Use: _____

Reminder: _____

Comment: _____

Well plugged _____

Pit mouse/rat holes, cellars backfilled _____

Debris removed _____

No disturbance /Location never built _____

Access Roads Regraded _____

Contoured _____

Culverts removed _____

Gravel removed _____

Location and associated production facilities reclaimed _____

Locations, facilities, roads, recontoured _____

Compaction alleviation _____

Dust and erosion control _____

Non cropland: Revegetated 80% _____

Cropland: perennial forage _____

Weeds present _____ Subsidence _____

1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% _____

TRANSECT RESULTS OF REFERENCE AREA% _____

TOTAL % OF DESIRABLE VEGETATION COVER _____

VEGETATIVE COVER _____

Comment: _____

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
	Fail		Fail		Fail	

Comment: Previous inspections required operator to implement required stormwater and erosion control BMPs until more permanent stabilization controls have been implemented and reclamation activities have been conducted. Previous inspections required operator to repair erosion degradation on access road and cattle guard at the access road gate. Operator has failed to implement and maintain Best Management Practices (BMPs) on the location/access road to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation, and has continued to ignore requirements per COGCC rule 1002.f. This corrective action will remain applicable until it has been addressed.

Corrective Action: Properly select, install and maintain REQUIRED stormwater and sediment control BMPs in accordance to 1002.f and good engineering practices.

Date: 10/12/2017

Pits: ☐ NO SURFACE INDICATION OF PIT**Attached Documents**You can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
401785783	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4599953
682503986	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4599936