

**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:

02/20/2019

Submitted Date:

02/21/2019

Document Number:

682504519**FIELD INSPECTION FORM**
 Loc ID 312291 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:8 Number of Comments2 Number of Corrective Actions☒ Corrective Action Response Requested**ANY CORRECTIVE ACTION(S) FROM
PREVIOUS INSPECTIONS THAT HAVE NOT
BEEN ADDRESSED ARE STILL APPLICABLE****Contact Information:**

Contact Name	Phone	Email	Comment
		denise.arthur@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
,		dnr_cogccenforcement@state.co.us	
		tcrumley@comcast.net	
		steve@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	RI
221078	WELL	IJ	08/01/2018	DSPW	075-09204	Propst 1	RI

General Comment:

Inspected Facilities									
Facility ID:	159442	Type:	UIC	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	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? _____ 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 _____

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 [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING RECLAMATION](#)

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 **11/15/2017**

Overall 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
Wattles	Fail					Straw Wattles

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER](#)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**COGCC Comments**

Comment	User	Date
RECLAMATION COMMENT The previous eight (8) 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 #10565 for additional information. Inspection dated 11/08/2018 documented that With exception to the gulley erosion on the west of the location, Operator appeared to have re-graded and reseeded the disturbed areas, however, Operator failed to implement stabilization and stormwater control BMPs per corrective actions and in accordance with 1002.f and erosion degradation had recurred. Unable to find evidence that stabilization controls have been implemented per the corrective action and per 1002.f; interim areas and slopes downgrade of the pit and location remain bare and exposed soil, and at risk to erosion degradation. This corrective action will remain in place and applicable until it has been addressed in its entirety.	trujilloam	02/21/2019
STORMWATER COMMENT Operator has placed straw wattles/erosion logs around perimeter of the pit, and portions of the interim areas downgrade of the pit. Erosion logs are temporary sediment control barriers and ponding BMPs that intercept sheet flow runoff from disturbed areas, and are required to be trenched and back-filled in order to be in proper functioning condition. Operator appears to have only placed/staked the erosion logs upon the surface of the soil; BMPs have not been trenched and back-filled in accordance with good engineering practices and are not in proper functioning condition. Inspection #682504105 notified Operator that erosion logs/wattles are not a stabilization control BMP; erosion logs/wattles alone will not mitigate erosion degradation from occurring or provide stabilization to the seeded soil per the reclamation corrective action.	trujilloam	02/21/2019
Comment copied from inspection #682504107: Areas to the south of the pit appear to have been seeded up/down the slope rather than parallel to the contour. This may likely contribute to future erosion concerns as the furrows have created a straight path that will allow stormwater to concentrate and accelerate downslope.	trujilloam	02/21/2019
It is noted that this is the 9th corrective action inspection since 08/25/2017 regarding reclamation and stormwater issues and concerns.	trujilloam	02/21/2019

Attached Documents

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

Document Num	Description	URL
682504520	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4741577