

**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:

682504516**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: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
Arthur, Denise		denise.arthur@state.co.us	
,		dnr_cogccenforcement@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
		steve@westernoperating.com	
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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, #682503670 dated 7/31/2018, #682503985 dated 10/4/2018 AND #682504105 dated 11/08/2018.

This inspection is to document compliance for the following corrective actions:

Rule 1002.f: Properly select, install and maintain temporary stormwater and sediment control BMPs until more permanent stabilization controls have been implemented and reclamation activities have been conducted.

Rule 1002.f: Implement stabilization and stormwater control BMPs to stabilize the seeded soil.

Rule 1002.f: Repair/stabilize erosion degradation on access road and cattle guard at the access road gate

Please refer to the Reclamation, Stormwater and Comment section of this report. 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? _____ 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 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 [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
Waddles	Fail					Straw wattles
		Tracking Pad	Pass			Cattle guard

Comment: SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER

Operator appears to have repaired and stabilized the erosion degradation at the cattle guard at the access road gate. This portion of the corrective action 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**COGCC Comments**

Comment	User	Date
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
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 #10266, and supplemental form 27 #401414059 for additional information. Inspection dated 11/08/2018 documented that operator appeared to have re-graded and re-seeded the disturbed areas, however, Operator failed to implement stabilization and stormwater control BMPs per corrective actions and in accordance with 1002.f. 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

Attached DocumentsYou can go to COGCC Images ([https://cogcc.state.co.us/weblink/](https://cogcc.state.co.us/webblink/)) and search by document number:

Document Num	Description	URL
401947140	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4741593
682504517	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4741575
682504518	Cattle Guard Repaired	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4741576