

**FORM  
INSP**

Rev  
X/20

**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:

08/24/2022

Submitted Date:

08/30/2022

Document Number:

696105387

**FIELD INSPECTION FORM**

Loc ID: 312292 Inspector Name: Edwardson, Dylan On-Site Inspection:  2A Doc Num: \_\_\_\_\_

**Status Summary:**

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

**Operator Information:**

OGCC Operator Number: 95620  
Name of Operator: WESTERN OPERATING COMPANY  
Address: 1165 DELAWARE STREET #200  
City: DENVER State: CO Zip: 80204

**Findings:**

- 11 Number of Comments
- 6 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
Trujillo, Aaron		aaron.trujillo@state.co.us	
		caitlin.stafford@coag.gov	
Arthur, Denise		denise.arthur@state.co.us	
James, Steven	(303) 893-2438	steve@westernoperating.com	<a href="#">All Inspections</a>

**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
312292	LOCATION	AC			-	PROPST-611N53W 27NESE	RI

**General Comment:**

On 08/24/2022, Reclamation Specialist Edwardson conducted an Interim Reclamation and Stormwater Inspection at PROPST-611N53W/27NESE in Logan County, Colorado.

This inspection is also in response to NOAV (doc#402277076) to document compliance with the following corrective actions and abatement: Stormwater, Reclamation, and Remediation.

The following compliance issues were observed during this inspection:

Refer to the "Reclamation" and "Stormwater" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	DEBRIS		
Comment:	During this inspection, it was observed that several straw wattles have blown off location; this is now considered debris. Refer to inspection photos		
Corrective Action:	Comply with Rule 606 and remove any debris by corrective action date.	Date:	09/06/2022
Type	UNUSED EQUIPMENT		
Comment:	There appears to be a access road drag/maintainer that is partially buried in sediment. Additionally, there were fencing materials not currently being used and stored on location next to the pump jack. Refer to inspection photos		
Corrective Action:	Comply with Rule 606 and remove any unused equipment by corrective action date.	Date:	09/24/2022

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**Inspected Facilities**

Facility ID: 221086 Type: WELL API Number: 075-09212 Status: PR Insp. Status: RI

Facility ID: 312292 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**Environmental**

**Spill/Remediation:**

Comment:

It was observed in this inspection that remediation and/or reclamation of the spill areas below the produced water pit are not progressing towards COGCC standards; desirable vegetative germination and establishment is not uniform; impacts due to spill remain apparent. See "Reclamation".

Additionally, stormwater management on the Location has been inadequate; erosion degradation from the pit berm has continued, resulting in additional off-site sediment transport and deposition. See "Stormwater"

F27 #402444865 (5/21/2020) states Operator conducted additional remediation and reclamation efforts (soil ripped 18", gypsum applied 2,500#/acres and tilled, mulch applied 2,000#/acre, areas reseeded b/w 11/1/2020 and 4/15/2021). F27s #402509005 and #402392898 (5/21/2020) also indicates additional samples were collected and submitted, and that soil contamination was delineated. After reviewing the figures and documents attached, it has become apparent that sampling efforts are inadequate to effectively delineate horizontal and vertical impacts of the entire spill area; Operator only sampled from two points within the 2 acre spill area, with three samples taken at a depth of 0-6", 6-12", 12-18"; per sample.

Remediation of the spill areas have not been resolved; remediation is now subject to 900 Series Rules (effective 1/15/2021), including Table 915-1 concentration and cleanup standards.

Corrective Action:

Per Rule 913.b.(2), the Operator will conduct sampling and analysis of soil, and groundwater--if encountered, to determine the horizontal and vertical extent of any contamination that is in excess of the cleanup concentrations in Table 915-1 for soil and groundwater- Operator shall collect an appropriate number of representative soil samples throughout the entire spill area to delineate the horizontal and vertical extents of contamination, per Rule 915.e.(2).B.

Operator shall also conduct sampling and analysis of soils at the perimeter berm of the produced water pit.

The Operator shall analyze samples for the complete Table 915-1 list and shall compare analytical results for site investigation samples to both the Table 915-1 Residential Soil Screening Level Concentrations and the Protection of Groundwater Soil Screening Level Concentrations.

Operator shall submit the comparative soil sample analysis to Table 915-1 attached to a supplemental Form 27, including map figures showing sample locations. Request Form 27 is routed to NE Reclamation Specialist Edwardson, and NW Reclamation Specialist Trujillo.

Date: 09/30/2022

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: \_\_\_\_\_

**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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment **During inspection it was observed that vehicle tracking occurred off location near the entrance of the location access road.**

Corrective Action **Operator shall abide by the reclamation rules to minimize surface disturbances per the 1002.e Rule. Inform any contractors and personnel about restrictive off site travel.  
Corrective Action date is the date the location was observed out of compliance.**

Date **08/24/2022**

1003a. Waste and Debris removed? \_\_\_\_\_

Comment **See "Good Housekeeping" section comments.**

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? Fail Production 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? Fail  
 Production areas have been stabilized? Fail 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 Fail

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 This location does not comply with 1003 Rules. See "COGCC Comments" section for Reclamation comments.

Corrective Action Perform remediation/reclamation and implement/maintain stabilization BMPs until Table 915-1 standards are met, at which point revegetation/reclamation activities shall be conducted in accordance to COGCC reclamation standards; establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until reclamation has passed.

Date 11/22/2022

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: <input style="width: 95%;" type="text"/>	
Corrective Action: <input style="width: 95%;" type="text"/>	Date: _____
Overall Final Reclamation <input type="checkbox"/>	Well Release on Active Location <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: <span style="color: blue;">This location does not comply with 1002.f Rules. See "COGCC Comments" section for Stormwater comments.</span>	
Corrective Action: <span style="color: red;">Repair erosion degradation. Properly select, install and maintain required stormwater and sediment control BMPs in accordance to 1002.f and good engineering practices.</span>	Date: <u>09/02/2022</u>

**Pits:**  NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256303	846025	

**COGCC Comments**

Comment	User	Date
<p><span style="color: blue;">Reclamation Comments:</span></p> <p>It appears that the Operator has performed remediation and reclamation activities on the affected Salt Kill areas. However, the attempts at reseeding have not resulted in sufficient vegetation cover as required by 1003 Rules. During this inspection, only sparse perennial vegetation(e.g. buffalo grass, blue grama) was observed on small portions of the location and the affected areas consisted of annual weedy vegetation, predominantly Kochia. Additionally, there were areas located immediately adjacent to the pit that are void of any vegetation, possibly a result of soils exceeding Table 915-1 standards that continue to persist and/or continued off site sediment transport not corrected by sufficient stormwater and erosion control BMPs. Some downslope areas affected by the salt kill have not revegetated and do not have sufficient stormwater BMPs to prevent further site degradation or erosion issues. Remediation and reclamation efforts on the Location do not appear to be sufficient; impacted soils likely remain resulting in reclamation failure.</p> <p><span style="color: blue;">Refer to attached inspection photos.</span></p>	edwardsond	08/26/2022
<p><span style="color: blue;">Stormwater Comments:</span></p> <p>Previous inspections required Operator to comply with 1002.f, repair erosion degradation, and properly select, install and maintain required stormwater and sediment control BMPs on the Location.</p> <p>COGCC Staff observed that stormwater and erosion control/stabilization BMPs were insufficient and/or have not been maintained in proper functioning condition; wattles have not been installed and maintained per good engineering practices resulting in further off site sediment transportation and degradation to adjacent lands. It appears the Operator has constructed a ditch and berm around the perimeter of the pit that is comprised of unconsolidated material placed on top of existing, failing, wattles resulting in further offsite sediment transport. The majority of the wattles are inadequate and are either missing, buried, or installed incorrectly. Further, the pit walls are not stabilized as evidenced by rill/gully erosion issues on the west, south, and east walls.</p> <p><span style="color: blue;">Refer to attached inspection photos.</span></p>	edwardsond	08/26/2022

**Attached Documents**

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

Document Num	Description	URL
696105388	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5843631">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5843631</a>