

**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:

11/22/2022

Submitted Date:

12/02/2022

Document Number:

696105616**FIELD INSPECTION FORM**Loc ID 312291 Inspector Name: Edwardson, Dylan 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:**9 Number of Comments3 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
Anderson, Laurel		laurel.anderson@state.co.us	
James, Steven	(303) 893-2438	steve@westernoperating.com	<a href="#">All Inspections</a>
Arthur, Denise		denise.arthur@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
		caitlin.stafford@coag.gov	
Fischer, Alex		alex.fischer@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221078	WELL	IJ	10/01/2020	DSPW	075-09204	Propst 1	RI
312291	LOCATION	AC			-	PROPST-611N53W 26SWSW	RI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	RI

**General Comment:**

This is a follow-up Interim Reclamation and Stormwater Inspection to FIR (Doc #696105386).

This inspection is also in response to NOAV (Doc #402282191) to document compliance with the following corrective actions and abatement: Stormwater, Reclamation, and Remediation.

The following compliance issues were observed during this inspection:

- Stormwater
- Reclamation

The following compliance issues are addressed in a separate Environmental Inspection Report (see Doc # 690900222)

- Good Housekeeping (Debris, Unused equipment)
- Environmental

It was observed in this inspection that the Location remains out of compliance with COGCC Rules, Corrective actions, as well as Abatement or Corrective Action requirements per NOAV #402282191.

Refer to the "Location", "Reclamation", "Environmental" 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:	<p>It appears the operator has removed the degraded straw wattle as identified in previous inspection report (Doc #696105386).</p> <p>However, debris and trash remain throughout the location. Refer to Environmental Inspection (Doc #690900222) for Comments and Corrective Action/Dates.</p> <p>Refer to attached inspection photos.</p>		
Corrective Action:		Date:	
Type	UNUSED EQUIPMENT		
Comment:	<p>A road maintenance piece of equipment containing an open barrel of crude/condensate was observed south of the heater treater on location. Any unused equipment needs to be removed and the crude/condensate needs to be properly disposed of. Refer to Environmental Inspection (Doc #690900222) for Comments and Corrective Action/Dates.</p> <p>Refer to attached inspection photos.</p>		
Corrective Action:		Date:	

Overall Good: ☐

<b>Spills:</b>				
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: 221078 Type: WELL API Number: 075-09204 Status: IJ Insp. Status: RIFacility ID: 312291 Type: LOCATION API Number: - Status: AC Insp. Status: RIFacility ID: 479472 Type: TANK API Number: - Status: AC Insp. Status: RI

**Environmental****Spill/Remediation:**

Comment:

Operator submitted Form 27 #402393447 on 5/21/2020 with soil sample analytical results from the salt kill area; inorganic exceedances remain apparent.

Operator submitted Form 27 #402445093 on 7/22/2020 stating additional remediation and reclamation efforts are planned (compaction alleviation, gypsum application, and mulching), with reseeding activities planned between 11/1/2020 and 4/15/2021.

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".

After reviewing the figures and documents attached to the Form 27s, it has been noted that Operator only collected from two sample points within the entire spill area, with three samples taken at a depth of 0-6", 6-12", 12-18"; it has been determined that the sampling efforts are inadequate to effectively delineate both the horizontal and vertical impacts of the entire spill area.

After additional review, it has become apparent that the remediation for the spill was originally tied to the remediation and closure of the Propst C1X Skim Pit (Facility ID 100316, Remediation Project #10565). On 5/21/2020, Operator submitted Form 27 #402393553 requesting closure of the skim pit; the Form 27 was approved, effectively closing Remediation Project #10565, though remediation issues and work remained ongoing for the affected spill areas.

Therefore, Operator is being required to submit a new Form 27 specifically related to the Produced Water pit (Facility ID #256304), to continue remediation of the spill areas under a new project.

Corrective Action:

Abatement or Corrective actions requirements per NOAV #402282191 have not been addressed, therefore the CA date of 02/17/2020 per the NOAV will remain applicable:

Date: 02/17/2020

Pursuant to Rule 913.c.(8), Operator shall submit a Form 27 to create a remediation project associated with Pit Facility #256304, in order to continue remediation of the spill areas. Include details that remediation project is associated with spill/impacts previously addressed under Project #10565.

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.

As discussed during the 11/17/2022 virtual meeting between COGCC and Western Operating Company, the Operator agreed to submit a Site Investigation/Remediation Workplan (Initial Form 27) providing a detailed site investigation approach to address the salt kill/release. Additionally, an Initial Form 19 will be required for the historic salt/kill release. It was also discussed that a Site Investigation/Remediation Workplan (Initial Form 27) will be required to close the Propst 1A pit, Pit Facility ID: 100310.

Please include on the Form 27s "Please route to Environmental Supervisor Alex Fischer and Reclamation Specialist Dylan Edwardson." Mr. Fischer also requested a courtesy email at the time the Form 27s are submitted.

See Environmental Inspection Report Doc #690900222 for additional details.

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 \_\_\_\_\_

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? Pass

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 Due to the ongoing stormwater, remediation and reclamation compliance issues, a CA date of 02/17/2020 per the NOAV #402282191 is being provided.

Date 02/17/2020

Complete remediation on the Location pursuant to Table 915-1 standards. After Soil Suitability for Reclamation standards have been met pursuant to Table 915-1, and/or impacted materials have been removed and properly disposed, Operator shall establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of pre-disturbance or reference area levels in accordance with COGCC 1003 Rules; pursuant to Rule 1002.f, ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until reclamation has passed.

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

Comment: This location does not comply with 1002.f Rules. See "COGCC Comments" section for Stormwater comments.

Corrective Action: Due to the ongoing stormwater compliance issues, a CA date of 10/12/2017 per the NOAV #402282191 is being provided.

Date: 10/12/2017

Repair erosion degradation. Properly select, install and maintain required stormwater and sediment control BMPs in accordance to 1002.f and good engineering practices. If it is determined that a specific BMP is insufficient to mitigate degradation on a site, cannot be implemented per installation specification, or maintained in effective operating condition, then alternative BMPs that are better suited to meet the site's conditions should be considered and applied, or used in conjunction.

**Pits:** ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256304	846026	
	256304	846026	

**COGCC Comments**

Comment	User	Date
<p><b>Stormwater Comments:</b></p> <p>Previous inspections and abatement requirements per NOAV #402282191 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>It should be noted that it does not appear the operator has addressed any previous stormwater corrective actions since the last inspection on 08/24/2022 (Doc #696105386), based on field observations during this inspection.</p> <p>It was observed in this inspection that stormwater and erosion/stabilization control BMPs remain inadequate and/or have not been maintained in proper functioning condition pursuant to Rule 1002.f, and per NOAV Abatement requirements; wattles implemented throughout Location have not been installed and maintained per good engineering practices, resulting in further off site sediment transportation and degradation to the adjacent lands; specifically, wattles observed are either missing ("blown out", debris), buried, or remain incorrectly installed.</p> <p>Operator appears to have constructed a ditch and berm around the perimeter of the pit; berm appears to have been constructed with impacted, unconsolidated material on top of an existing wattle, rendering the wattle control inadequate; this has resulted in further degradation and offsite sediment transport. Further, the pit walls remain unstabilized resulting in continued rill/gully erosion/degradation issues on the west, south, and east walls.</p> <p>Refer to attached inspection photos.</p>	edwardsond	11/29/2022



**Reclamation Comments:**

edwardsond

11/29/2022

Operator submitted Form 4 #402396288 on 5/21/2020 stating "reclamation actions took place at the Location in April and March 2018". Operator also submitted Form 27#402445093 on 7/22//2020 stating additional remediation and reclamation efforts are planned (compaction alleviation, gypsum application, and mulching), with reseeding activities planned between 11/1/2020 and 4/15/2021.

Whether work was conducted or not, it was observed in this inspection that no successful reclamation and/or remediation occurred on the Location. Revegetation of impacted areas are not progressing towards COGCC 1003 standards and requirements; perennial vegetation (e.g. buffalo grass, blue grama) observed was sparse on small portions of the location; affected areas consisted predominantly of annual Undesirable (weedy) Plant Species, such as Kochia.

It was also observed that downslope areas within the impacted spill area, as well as areas immediately adjacent to the pit where desirable perennial vegetative establishment is not occurring, and inadequate stormwater and erosion/stabilization control BMPs have resulted in continued off-site sediment transport and deposition from the pit.

Remediation and reclamation efforts on the Location are insufficient/inadequate; impacted soils remain apparent resulting in reclamation failure.

Refer to attached inspection photos.

**Attached Documents**

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

Document Num	Description	URL
696105617	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5931647">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5931647</a>