

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

11/22/2022

Submitted Date:

12/05/2022

Document Number:

690900217

## FIELD INSPECTION FORM

 Loc ID: 312292  
 Inspector Name: FISCHER, ALEX  
 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:**

- 13 Number of Comments
- 10 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
		caitlin.stafford@coag.gov	
James, Steven	(303) 893-2438	steve@westernoperating.com	All Inspections
Anderson, Laurel		laurel.anderson@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Edwardson, Dylan		dylan.edwardson@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	

**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	PR
256303	PIT	AC			-	PROPST B-2	AO

**General Comment:**

On November 22, 2022, COGCC Environmental and Reclamation Staff (Alex Fischer, Alex Ahmadian, Laurel Anderson, Denise Arthur, Chris Binschus, and Dylan Edwardson) conducted environmental and reclamation field inspections of Western Operating Company (Western) Probst B #2 (Location ID: 312292). Weather was clear with a slight breeze and temperature about 45 degrees Fahrenheit. For the most recent field inspection report of this facility, please refer to Document #696105614.

The following is a summary:

- Pit Facility ID 256303 is open and does not appear to be in use;
- Stormwater issues (to be addressed under a separate inspection);
- Reclamation (to be addressed under a separate inspection);
- Housekeeping; and
- Environmental.

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

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

Location					
Overall Good: <input type="checkbox"/>					
<b>Signs/Marker:</b>					
Type	BATTERY				
Comment:	Emergency Contact # illegible from a distance.				
Corrective Action:	Comply with Rule 605.e.				Date: 01/27/2023
Emergency Contact Number:					
Comment:	Emergency Contact # illegible from a distance.				
Corrective Action:	Comply with Rule 605.e. and g.				Date: 01/27/2023
<b>Good Housekeeping:</b>					
Type	TRASH				
Comment:	Trash and debris throughout location and in Pit Facility. Cigarette butt within well fence enclosure. Trash near pit. Trash and debris inside of pit (broken glass, spark plugs, shotgun shell casing, metal pipe). Tumble weed accumulatioin within pit enclosure on south side of pit.				
Corrective Action:	Comply with Rule 606.				Date: 10/12/2017
Overall Good: <input type="checkbox"/>					
<b>Spills:</b>					
Type	Area	Volume			
Other	WELLHEAD				
Comment:	Apparent gas leak at wellhead polish rod and flange (see attached video DSCN1733.MOV). On 11/28/2022 at approximately 13:38 Alex Fischer contacted Mr. Steven James regarding the stuffing box and gas leak. Mr. James stated that he would get crews to fix it ASAP.				
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.				Date: 12/15/2022
Crude Oil	Pump Jack	<= 1 bbl			
Comment:	Stuffing box leaking with oil and paraffin accumulation.				
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.				Date: 12/30/2022
Crude Oil	Separator	<= 1 bbl			
Comment:	Hammer union weeping oil and oil staining on ground.				
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.				Date: 12/29/2022
In Containment: No					
Comment:	Apparent gas leak at wellhead polish rod and flange (see attached video DSCN1733.MOV). On 11/28/2022 at approximately 13:38 Alex Fischer contacted Mr. Steven James regarding the stuffing box and gas leak. Mr. James stated that he would get crews to fix it ASAP.				
<input checked="" type="checkbox"/> Multiple Spills and Releases?					
<b>Tanks and Berms:</b>					
Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLs	STEEL AST		,

Comment:	Valve handles found on valves with evidence of livestock within fenced tank battery enclosure. The lid on the secondary containment loadout can was found open. Unmarked flowline risers.	
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.	Date: 12/13/2022

**Paint**

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

**Berms**

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Berms at tank battery and separator appear to be constructed of earthen material including sand and gravel. Multiple animal burrows were observed to be penetrating the berm(s).			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 912.d.(1).			Date: 12/18/2022

**Venting:**

Yes/No		
Comment:		
Corrective Action:		Date:

**Flaring:**

Type	
Comment:	
Corrective Action:	Date:

**Location Construction**

Location ID: 312292 CDP: \_\_\_\_\_

Comment: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

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

**Form 2A COAs:**

**Comment:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_

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

**Wildlife BMPs:**

**Comment:** \_\_\_\_\_

Corrective Action: \_\_\_\_\_

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

**Comment:** \_\_\_\_\_

**Corrective Action:** \_\_\_\_\_

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

**On Site Inspection (305):**

Surface Owner Contact Information:

Name: \_\_\_\_\_ Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Cell Phone: \_\_\_\_\_

Operator Rep. Contact Information:

Landman Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Date Onsite Request Received: \_\_\_\_\_ Date of Rule 306 Consultation: \_\_\_\_\_

Request LGD Attendance: \_\_\_\_\_

LGD Contact Information:

Name: \_\_\_\_\_ Phone Number: \_\_\_\_\_ Agreed to Attend: \_\_\_\_\_

Summary of Landowner Issues:

\_\_\_\_\_

Summary of Operator Response to Landowner Issues:

\_\_\_\_\_

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

\_\_\_\_\_

**Inspected Facilities**

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

Facility ID: 256303 Type: PIT API Number: - Status: AC Insp. Status: AO

**Environmental**

**Spills/Releases:**

Type of Spill: PRODUCED WATER Estimated Spill Volume: \_\_\_\_\_

Comment: F27 Doc 401254702 was submitted on 07/10/2017 to remove a Tinhorn /oil skim culvert, impacted soils and approximately 100,000 square feet of vegetation salt kill. This F27 was approved creating Remediation #10266. F27 Doc #402483626 was submitted 09/08/2020 requesting closure of REM #10266. COGCC EPS, unchecked remediation closure request,"soils do not meet Table 910-1 inorganics in soil levels."NOTE: Based on Water Well Permit #26047, depth to groundwater is app 80' bgs.

Corrective Action: 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 and provide a detailed site investigation approach to address the salt kill/release. Additionally, an Initial Form 19 will be required for the salt/kill release. Please include on the Form 27 "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. Date: 02/17/2020

Reportable: YES GPS: Lat \_\_\_\_\_ Long \_\_\_\_\_  
 Proximity to Surface Water: \_\_\_\_\_ Depth to Ground Water: 80

**Water Well Complaint:**

DWR Receipt Num: \_\_\_\_\_ Owner Name: \_\_\_\_\_ GPS : \_\_\_\_\_ Lat \_\_\_\_\_ Long \_\_\_\_\_

**Field Parameters:**

Sample Location: \_\_\_\_\_ Comment: \_\_\_\_\_

**Spill/Remediation:**

Comment: \_\_\_\_\_  
 Corrective Action: \_\_\_\_\_ Date: \_\_\_\_\_

Emission Control Burner (ECB): \_\_\_\_\_  
 Comment: \_\_\_\_\_  
 Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**Reclamation - Storm Water - Pit**

**Storm Water:**

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

Comment:

Corrective Action:

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

**Pits:**     NO SURFACE INDICATION OF PIT

Type: Produced Water      Lined: NO      Pit ID: 256303      Lat: 40.896586      Long: -103.269408

Reference Point: \_\_\_\_\_      Other: \_\_\_\_\_      Length: \_\_\_\_\_      Width: \_\_\_\_\_

**Lining:**

Liner Type: \_\_\_\_\_      Liner Condition: \_\_\_\_\_

Comment: Form 27 Doc 401254702 was submitted on 07/10/2017 to remove a Tinhorn /oil skim culvert, impacted soils and approximately 100,000 square feet of vegetation salt kill. This Form 27 was approved creating Remediation #10266. Form 27 Doc #402483626 was submitted 09/08/2020 requesting closure of REM #10266. COGCC EPS, unchecked remediation closure request, "soils do not meet Table 910-1 inorganics in soil levels."

Date: 02/17/2020

Corrective Action 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 F27 and provide a detailed site investigation approach to close Pit Facility ID 256303.

Upon COGCC approval, submit a Supplemental F27 requesting closure of REM #10266 as work will move forward on the newly created REM # for Pit Facility ID 256303.

Submit an Initial Form 27 to close Pit Facility ID 100311. Upon COGCC approval, submit a Supplemental Form 27 requesting closure of the newly created REM # as work will move forward under REM # that will be created for Pit Facility ID: 256303. This will then close Pit Facility ID 100311 in the database

**Fencing:**

Fencing Type: \_\_\_\_\_      Fencing Condition: \_\_\_\_\_

Comment:

Corrective Action

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

**Netting:**

Netting Type: \_\_\_\_\_      Netting Condition: \_\_\_\_\_

Comment:

Corrective Action

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

Anchor Trench Present: \_\_\_\_\_      Oil Accumulation: \_\_\_\_\_      2+ feet Freeboard: \_\_\_\_\_

Comment:

Corrective Action

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

Permit:	Facility ID	Permit Num	Expiration Date
	256303	846025	
	256303	846025	

