

**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:

05/15/2023

Submitted Date:

05/17/2023

Document Number:

690204212

FIELD INSPECTION FORMLoc ID 470757 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 1165 DELAWARE STREET #200

City: 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 Comments

7 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 |
|-------------------|-------|----------------------------------|---------|
| James, Steven D | | steve@westernoperating.com | |
| COGCC Enforcement | | dnr_cogccenforcement@state.co.us | |
| Hart, Dale | | dale@westernoperating.com | |

Inspected Facilities:

| Facility ID | Type | Status | Status Date | Well Class | API Num | Facility Name | Insp Status |
|-------------|----------|--------|-------------|------------|---------|----------------------|-------------|
| 470757 | Location | AC | | | - | PYLES-619S45W 10SEnw | RI |

General Comment:

On 5/15/2023, Ryan Costa conducted a follow up inspection of the Pyles #4 Offsite tank battery location.
The corrective actions of the previous reclamation inspection have not been completed.
Non-compliance with the Rules will be referred for enforcement.
See attached photos and additional details within this report.

LocationOverall Good: ☐**Signs/Marker:**

| | | | |
|--------------------|---------|-------|--|
| Type | BATTERY | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Emergency Contact Number:

| | | |
|--------------------|--|-------------|
| Comment: | | Date: _____ |
| Corrective Action: | | |

Good Housekeeping:

| | | | |
|--------------------|--|-------|------------|
| Type | OTHER | | |
| Comment: | The shed inside the containment battery is not maintained and metal siding is laying on the ground. Previous corrective action has not been completed. | | |
| Corrective Action: | Maintain in good mechanical condition per Rule 608.e | Date: | 04/07/2023 |
| Type | DEBRIS | | |
| Comment: | There is various waste and debris on the location. Observed pile of broken concrete, broken tank bottom, bent rusty metal, weed trash debris ect. Previous corrective action has not been completed. | | |
| Corrective Action: | Comply with Rule 1003.a. and 606 to remove waste and debris | Date: | 04/07/2023 |
| Type | STORAGE OF SUPL | | |
| Comment: | There is various unused unneeded equipment and supplies stored at the location. Some equipment appears to have been stored for a long duration of time and is not in use. Previous corrective action has not been completed. | | |
| Corrective Action: | Comply with Rule 1003.a. and 606 to remove unused unneeded equipment and supplies stored at the location. | Date: | 04/07/2023 |

Overall Good: ☐**Spills:**

| | | | | |
|--------------------|--|--------|--|------------------|
| Type | Area | Volume | | |
| Crude Oil | Tank | | | |
| Comment: | There was a spill from the backside of the tank battery. There is also stained soil at the pipe outlet that needs to be cleaned up. Previous corrective action has not been completed. | | | |
| Corrective Action: | Control and contain spills/releases and clean up per Rule 912.a. | | | Date: 04/07/2023 |

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

| | | | |
|--------------------|--|-------|--|
| Yes/No | | | |
| Comment: | | | |
| Corrective Action: | | Date: | |

Flaring:

| | | |
|--------------------|--|-------|
| Type | | |
| Comment: | | |
| Corrective Action: | | Date: |



Reclamation - Storm Water - Pit**Interim Reclamation:**

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION1002a. FENCING FailComment Location is fenced however cattle tracks were observed inside the fenced area. Fence needs to be built and maintained to prevent livestock entry.Corrective Action Comply with the fencing requirements per the 1002a rulesDate 05/24/20231002b. SOIL REMOVAL AND
SEGREGATION _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION Fail

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? Fail

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? Fail

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 ? _____
- 1003c. Compacted areas have been cross ripped? Fail
- 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? _____ 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

The tank battery location is being used as an unpermitted storage yard and was never reclaimed. The use of this location as a storage yard is prohibited per the rules. All unused equipment and supplies must be removed and interim reclamation must be performed. All disturbed areas affected by operations, except areas reasonably needed for production operations must be reclaimed per Rule 1003. Previous corrective action has not been completed.

Corrective Action

Comply with 1003 Rules.

Date **04/15/2023**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 <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: The two buckets of oil were removed however stained soil was not cleaned up. There are barrels and containers not properly stored with secondary containment. Additionally storage is prohibited if not needed for this location and should be removed. Previous corrective action has not been completed.

Corrective Action: Implement or modify BMPs for improved material handling and spill prevention.

Date: 03/10/2023

Pits: ☒ NO SURFACE INDICATION OF PIT

Attached Documents

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

| Document Num | Description | URL |
|--------------|-------------------|---|
| 690204213 | Inspection Photos | http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117140 |