

**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:

05/17/2023

Submitted Date:

05/17/2023

Document Number:

690204224

FIELD INSPECTION FORM

Loc ID 324797 Inspector Name: COSTA, RYAN 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:

- 5 Number of Comments
- 4 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
COGCC Enforcement		dnr_cogccenforcement@state.co.us	
Hart, Dale	719-688-1638	dale@westernoperating.com	
James, Steven	(303) 893-2438	steve@westernoperating.com	
Arthur, Denise		denise.arthur@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Kosola, Jason		jason.kosola@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
212663	WELL	SI	01/01/2022	OW	061-06023	DAWSON A 1	RI
481653	SPILL OR RELEASE	CL	03/14/2022		-	Dawson A 1 tank battery	RI

General Comment:

On 5/15/2023, Ryan Costa conducted a follow up reclamation inspection of the Dawson A 1 tank battery. This is a follow up of the previous inspections; #690203289, #690203496, #690203711, 690203950. The corrective actions of the previous reclamation inspections have not been completed. Non-compliance with the Rules will be referred to enforcement. See attached photos and additional details within this report.

Environmental

Waste Management:

Type	Management	Condition	GPS (Lat) (Long)	
Oily Soil	Piles	Inadequate		
Comment	Contaminated soils are not being properly stored with liner and proper secondary containment and need to be removed from the location. E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. Previous corrective action was not completed and must be performed immediately.			
Corrective Action	Immediately Comply with Rule 905.			Date:

Spill/Remediation:

Comment:	Remediation Project #20712 remains ongoing and excavation has been open for more than 12 months. There was previous spills that had occurred downhill from the tank battery. This impacted area has been excavated with some areas excavated deeper than other areas. There are still areas of oil stained soil at the surface that need to be cleaned up. Additional excavation is needed to remove contaminated soils. Remediation project does not appear to be progressing in a timely manner. Previous corrective action was not completed and must be performed immediately.			
Corrective Action:	Clean up and remove stained soils per Rule 912.a. Properly dispose of oily waste in accordance with 905.e.			Date: _____

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? _____

Comment _____

Corrective Action _____

Date _____

1003b. Area no longer in use? Fail Production areas stabilized ? Fail
 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? Fail Segregated soils have been replaced? _____

RESTORATION AND REVEGETATION

Cropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 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 Remediation Project #20712 remains ongoing and excavation has been open for more than 12 months. Remediation and reclamation does not appear to be progressing. All disturbed areas must be recontoured and reclaimed per 1003 Rules. Soil was imported and stockpiled at the location and has not been stabilized.

Corrective Action Comply with the 1003 interim reclamation rules. Date _____

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: Topsol being stored on location is not stabilized and erosion is occurring. There are inadequate stormwater controls installed around the topsoil pile and location. A recent storm event has filled in and overtopped wattles moving sediment offsite. BMP's have not been maintained and no additional BMP's were installed since previous inspection. Previous corrective action was not completed and must be performed immediately.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)C

Date: 01/06/2023

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
690204225	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6117146