

**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:

07/06/2023

Submitted Date:

07/07/2023

Document Number:

690204400**FIELD INSPECTION FORM**Loc ID 324797 Inspector Name: COSTA, RYAN 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:5 Number of Comments4 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	
James, Steven D		steve@westernoperating.com	
Sanchez, Chris		chris.sanchez@state.co.us	
COGCC Enforcement		dnr_cogccenforcement@state.co.us	
Hart, Dale		dale@westernoperating.com	
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
324797	LOCATION	AC			-	DAWSON A-619S45W 9NENW	RI

General Comment:

On 7/6/2023, 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, #690204224. 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? FailProduction areas stabilized ? Fail1003c. 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? FailProduction areas have been stabilized? Fail

Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____

Recontoured _____

Perennial forage re-established _____

Non-CroplandTop soil replaced FailRecontoured Fail80% 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)

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
690204401	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173191