

**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:

08/09/2023

Submitted Date:

08/11/2023

Document Number:

713600079

**FIELD INSPECTION FORM**Loc 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:**

10 Number of Comments

9 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	
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 10SEW	RI
484587	TANK BATTERY	AC	06/12/2023		-	Pyles 4 Tank Battery	RI

**General Comment:**

On 8/9/2023, Ryan Costa conducted a follow up inspection and in regard to complaint #403484076.  
The corrective actions of the previous reclamation inspection have not been completed.  
Corrective actions will remain out of compliance until completed.  
See attached photos and additional details within this report.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	UNUSED EQUIPMENT		
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 for the tank battery facility. 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
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	OTHER		
Comment:	Previous inspection observed metal shed inside the containment battery was not maintained and metal siding was laying on the ground. This shed has been removed and placed in the storage area due to work being performed at the separator.		
Corrective Action:	Maintain in good mechanical condition per Rule 608.e	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 and at the pipe outlet where bucket is capturing oil. Ther is also oil stained soils observed at the separator. 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:

**Inspected Facilities**Facility ID: 470757 Type: Location API Number: - Status: AC Insp. Status: RI**Complaint**

Comment: On 8/9/2023, ECMC Reclamation Specialist conducted an inspection in regard to complaint #403484076.

Complaint states unauthorized use of property as a pipe yard/ junk yard. Building falling down with insulation blowing into pasture. Fence that is in disrepair and cattle in the storage yard. See complaint for full details.

It was observed that a storage yard was located at the active Pyles 4 Tank Battery location. There was unused equipment, pipe, and supplies that were not in use for operations of this tank battery location. There was plastic trash debris caught in the fence and other various debris that could blow offsite into the landowner's pasture. There was an area of the fence that was in disrepair where livestock could access the tank battery location and storage yard. These issues have been documented in previous inspections which have not been addressed by the operator.

Corrective Action: See Corrective Actions within this inspection.  
Corrective actions will remain out of compliance until completed.

Date:

Facility ID: 484587 Type: TANK API Number: - Status: AC Insp. Status: RI**Producing Well**

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 STABILIZATION**1002a. FENCING FailComment There is an area at the east side of the location where the fence is not maintained to prevent livestock entry.Corrective Action Comply with the fencing requirements per the 1002a rulesDate 08/09/20231002b. 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? FailComment There is plastic trash caught in the fence that needs to be removed. All trash and debris needs to be removed.Corrective Action Comply with Rule 606.Date 08/09/2023Unused 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 REVEGETATION**Cropland

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 RulesDate 04/15/2023Overall 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: There are oil stained soils that have 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.  
There is an erosion channel at the north side of the location which is transporting sediment offsite.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)  
Implement or modify BMPs for improved material handling and spill prevention.  
Conduct maintenance on equipment, cleanup stained material and review self inspection processes.

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
713600081	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6216426">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6216426</a>