

**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:

11/14/2023

Submitted Date:

11/30/2023

Document Number:

709100174

FIELD INSPECTION FORMLoc ID 312291 Inspector Name: Heibel, Krystal 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:

18 Number of Comments

15 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	(303) 893-2438	steve@westernoperating.com	All Inspections
Kyle Waggoner		kyle.waggoner@state.co.us	
Krystal Heibel		krystal.heibel@state.co.us	
Alex Fischer		alex.fischer@state.co.us	
Dylan Edwardson		dylan.edwardson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	EI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	Propst 1	EI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	EI

General Comment:

On November 14, 2023, ECMC Environmental Staff Krystal Heibel conducted an environmental field inspection of Western Operating Company (Western) Probst B #1 (Location ID: 312291).

Refer to Reclamation Inspection Report (Doc# 708200710) for further information. This location has an associated AOC with Order No. (1V-870).

Weather was sunny, and temperature about 60 degrees Fahrenheit. For the most recent field inspection report of this facility, please refer to Document #709100120.

The following is a summary:

At the time of inspection, Pit Facility ID 256304 had fluid levels approx. 8 feet below top of berm. Visible hydrocarbons were present, and fluids were observed entering the pit.

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.

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

Type	BATTERY		
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e.	Date:	01/27/2023
Type	OTHER		
Comment:	300-bbl tank at pit facility ID 256304 not labeled or placard.		
Corrective Action:	Comply with Rule 605.e.g. and h.	Date:	01/27/2023
Type	OTHER		
Comment:	Vertical separator.		
Corrective Action:	Emergency Contact # illegible from a distance.	Date:	01/27/2023

Emergency Contact Number:

Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e. and g.	Date:	03/27/2023

Good Housekeeping:

Type	OTHER		
Comment:	Water within the pit was a shade of pink/red.		
Corrective Action:	Operator shall provide analytical results, sampling for full Table 437-1, Table 915-1, and Table 615.e.(2). (excluding the dissolved gasses and bacteria analysis) for the water within the pit. Water shall also be sampled for Rule 909.j.(1). If analytes are duplicated within the tables, there is no need to duplicate the sampling. Operator shall submit the analytics within the supplemental Form 27 submittal.	Date:	11/20/2023
Type	TRASH		
Comment:	Trash and debris throughout Location.		
Corrective Action:	Comply with Rule 606	Date:	12/12/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	Tank	<= 1 bbl		
Comment:	Hydrocarbon staining observed beneath valve and on the north side of tank at its base. (This may be a potential leak.)			
Corrective Action:	Properly dispose of oily waste in accordance with 905.e. Operator shall document integrity of the structure(tank) within 15 days.			Date: 08/23/2023
Crude Oil				
Comment:	Hydrocarbon staining observed within the pit. Refer to photo documentation.			
Corrective Action:	Properly dispose of oily waste in accordance with 905.e.			Date: 01/01/2024
Crude Oil	WELLHEAD	<= 1 bbl		
Comment:	Hydrocarbon staining observed beneath the fence next to the injection well shed.			
Corrective Action:	Properly dispose of oily waste, in accordance with 905.e.			Date: 10/23/2023

In Containment: No

Comment:

☒ Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		
Comment:	During the Aug 3, 2023, inspection, (Doc #709100064) impacted E&P waste was observed directly on the ground near the separator.		
Corrective Action:	Operator shall provide waste manifests for the E&P disposal within a supplemental Form 27 submittal.		Date: 11/20/2023
Type:	#		
Comment:	Thieves hatch was open in the produced water tank.		
Corrective Action:	Close and seal gauge hatches when not accessing tank.		Date: 10/23/2023
Type: Other	#		
Comment:	Unmarked riser at tank battery.		
Corrective Action:	Maintain active and inactive flowlines and crude oil transfer lines to meet rule 1102.i.		Date: 08/10/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
PRODUCED WATER	1	300 BBLS	FIBERGLASS AST		40.893001,-103.264654
Comment:	Tank not labeled or placard.				
Corrective Action:	Comply with Rule 605.e. and g.				Date: 01/27/2023

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Comment:	Secondary containment is inadequate to contain 150% of the volume of the largest tank.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.			Date: 01/04/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities									
Facility ID:	159442	Type:	UIC	API Number: -	Status:	AC	Insp. Status:	EI	
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	Insp. Status:	EI
Facility ID:	479472	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	EI

Environmental**Spills/Releases:**

Type of Spill: OIL

Estimated Spill Volume: _____

Comment: Oil staining at wellhead and filter (< 1 bbl). Filter socks appeared to be properly stored. Valves and fittings weeping oil at well head and tank battery.

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a.

Date: 01/05/2023

Reportable: _____

GPS: Lat _____

Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

COGCC Comments

Comment	User	Date
See Reclamation Inspection Doc #708200710.	heibelk	11/30/2023

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

Document Num	Description	URL
403611815	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6340048
709100175	photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6340038