

**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:

12/20/2023

Submitted Date:

12/28/2023

Document Number:

709100195**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Heibel, Krystal 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:11 Number of Comments8 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
Dylan Edwardson		dylan.edwardson@state.co.us	
Krystal Heibel		krystal.heibel@state.co.us	
Kyle Waggoner		kyle.waggoner@state.co.us	
Alex Fischer		alex.fischer@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	EI
479436	OFF- LOCATION FLOWLINE	AC	02/22/2021		-	Wellhead Line 27NESE	EI

General Comment:

On December 20, 2023, ECMC Environmental Staff Krystal Heibel and Alex Fischer conducted an environmental field inspection of Western Operating Company (Western) Probst B #2 (Location ID: 312292).

This location has an associated AOC with Order No. (1V-870). Weather was sunny and temperature about 30 degrees Fahrenheit. For the most recent environmental field inspection report of this facility, please refer to Document #709100172.

The following is a summary: Pit Facility ID 256303 is not in use. Recent activity indicated that pit's berms were pushed into a stockpile south of the location. There were no fluids covering the pit floor.

During the time of the inspection, Caleb Haley, Todd Troutman, and Brian Sulzberger (Ensolum) were on location.

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

Emergency Contact Number:			
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e. and g.		Date: 01/26/2023

Good Housekeeping:			
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (poly tank, metal fence, barbed wire, and wooden pole) on site.		
Corrective Action:	Comply with Rule 606		Date: 12/15/2023
Type	OTHER		
Comment:	An approx. 3000 cubic-yard stockpile has been added to the south of the location which increased the location footprint.		
Corrective Action:	Operator shall submit an updated Form 2A (Oil and Gas Location Assessment) to the ECMC to increase the existing Oil and Gas Location, as required by Rule 304.		Date: 01/29/2024

Overall Good: ☐

Spills:			
Type	Area	Volume	
Crude Oil	Truck Loadout	<= 1 bbl	
Comment:	Loadout container observed to be open and overflowing with hydrocarbon soil staining on ground.		
Corrective Action:	Properly dispose of oily waste in accordance with 905.e.. Remove fluids from secondary containment, and secure the lid to the secondary loadout to prevent winds from blowing the containment lid open.		Date: 08/24/2023

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type:	#		
Comment:	A 3" valve near the wellhead and within the shed were not plugged.		
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.		Date: 08/24/2023

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS
Comment:	Unmarked flowline risers.				
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.				Date: 12/13/2022

Paint

Condition					
Other (Content)					
Other (Capacity)					
Other (Type)					
Berms					
Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance	
Comment:					
Corrective Action:					Date:
Venting:					
Yes/No					
Comment:					
Corrective Action:				Date:	
Flaring:					
Type					
Comment:					
Corrective Action:				Date:	

Inspected Facilities				
Facility ID: 221086	Type: WELL	API Number: 075-09212	Status: PR	Insp. Status: EI
Facility ID: 479436	Type: OFF-	API Number: -	Status: AC	Insp. Status: EI

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

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: [See "Inspector/ECMC Comments" Section below.](#)Corrective Action: **Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices and repair erosion degradation.**

Date: _____

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256303	846025	

COGCC Comments

Comment	User	Date
Stormwater Comments: This location does not comply with Rule 1002.f. It does not appear the Operator has repaired any existing erosion degradation or installed/implemented additional stormwater control measures/BMPs that would prevent further site degradation. BMPs were not installed per good engineering practices (e.g. not trenched or properly staked) and is not adequate for stormwater management in its current application. Production areas experiencing stormwater erosion degradation do not appear to have been repaired or to have had implementation of more robust control measures installed. Additionally, a new stormwater berm was observed south of the 4000 cubic yard stockpile. Recent earthwork around the pit has left unconsolidated material susceptible to both wind and water erosion degradation and requires temporary BMPs immediately. Stormwater control measures/BMPs remain inadequate for this location. Refer to attached inspection photos for additional documentation.	heibelk	12/28/2023

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

Document Num	Description	URL
709100196	photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6374624
709100201	photos 2	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6374630