

**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:

01/10/2024

Submitted Date:

01/11/2024

Document Number:

713600593

**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

7 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 |         |
| Hart, Dale    | 719-688-1638   | dale@westernoperating.com  |         |

**Inspected Facilities:**

| Facility ID | Type         | Status | Status Date | Well Class | API Num | Facility Name        | Insp Status |
|-------------|--------------|--------|-------------|------------|---------|----------------------|-------------|
| 484587      | TANK BATTERY | AC     | 06/12/2023  |            | -       | Pyles 4 Tank Battery | RI          |

**General Comment:**

This is a follow up reclamation inspection and in regard to complaint #403484076.  
The corrective actions of the previous reclamation inspections have not been completed.  
Corrective actions will remain out of compliance until completed.

The date of discovery is given for all new corrective action dates. It is ECMC's expectation that Operators are in compliance with ECMC rules at all times. Therefore, No extended CA dates are applied and the corrective action will remain out of compliance until completed.  
Date Run:

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

|                    |   |  |                            |
|--------------------|---|--|----------------------------|
| Type               | DEBRIS  |  |                            |
| Comment:           | There is various waste and debris on the location which is a fire hazard. Observed tumble weed debris, plastic chemical containers, parts, trash ect. Previous corrective action has not been completed.  |  |                            |
| Corrective Action: | Comply with Rule 606 for Good Housekeeping and Rule 610 Fire Prevention and Protection.   |  | Date: <u>04/07/2023</u>    |
| Type               | STORAGE OF SUPL   |  |                            |
| Comment:           | There is various unused equipment and supplies stored at the location. Some equipment and supplies appear to have been stored for a long duration of time and are not in use for the tank battery facility. The various supplies are not stored in a workmanlike manner and are scattered on the ground. Some of the parts and supplies are rusty and bent and non functional. 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: <u>04/07/2023</u>    |
| Type               | OTHER   |  |                            |
| Comment:           | There was a reported fire incident that recently occurred at the heater treater. The treater has since fallen over and needs to be removed if it is no longer functional.   |  |                            |
| Corrective Action: |   |  | Date: <input type="text"/> |

Overall Good: ☐

|                    |  |        |  |                         |
|--------------------|--|--------|--|-------------------------|
| <b>Spills:</b>     |  |        |  |                         |
| Type               | Area   | Volume |  |                         |
| Crude Oil          | Tank   |        |  |                         |
| Comment:           | There are stained soils at the tank battery loadout and along the berm of the containment (photo 4, 5). There are also oil stained soils at the heater treater that has fallen over. |        |  |                         |
| Corrective Action: | Control and contain spills/releases and clean up per Rule 912.a.   |        |  | Date: <u>01/10/2024</u> |

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Tanks and Berms:**

| Contents           | # | Capacity | Type | Tank ID | SE GPS |  |
|--------------------|---|----------|------|---------|--------|--|
| CRUDE OIL          | 1 | 400 BBLS |      |         | ,      |  |
| Comment:           |   |          |      |         |        |  |
| Corrective Action: |   |          |      |         | Date:  |  |

**Paint**

|                  |                      |  |
|------------------|----------------------|--|
| Condition        | <input type="text"/> |  |
| Other (Content)  |                      |  |
| Other (Capacity) |                      |  |
| Other (Type)     |                      |  |

| Berms              |  |                     |                     |             |        |            |
|--------------------|--|---------------------|---------------------|-------------|--------|------------|
| Type               | Capacity   | Permeability (Wall) | Permeability (Base) | Maintenance |        |            |
| Earth              | Adequate   | Walls Insufficient  |                     |             |        |            |
| Comment:           | The walls of the earthen berm have been rebuilt but the loose soil material must be compacted to be impermeable. |                     |                     |             |        |            |
| Corrective Action: | Repair or install berms or other secondary containment devices per Rule 603.o.                                   |                     |                     |             | Date:  | 01/10/2024 |
| Contents           | #  | Capacity            | Type                | Tank ID     | SE GPS |            |
| PRODUCED WATER     | 2  | 300 BBLS            |                     |             | ,      |            |
| Comment:           | Shared berms   |                     |                     |             |        |            |
| Corrective Action: |  |                     |                     |             | Date:  |            |
| 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:  |            |



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

Date Interim Reclamation Started: \_\_\_\_\_ Date Interim Reclamation Completed: \_\_\_\_\_

Land Use: \_\_\_\_\_

Comment: \_\_\_\_\_

**1002 SITE PREPARATION AND STABILIZATION**1002a. FENCING Fail

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 Fail

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1003a. Waste and Debris removed? Fail

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

Unused 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? 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? Fail

Production areas have been stabilized? \_\_\_\_\_

Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

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

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: <span style="border: 1px solid black; display: inline-block; width: 600px; height: 20px;"></span>        | Date <span style="border: 1px solid black; display: inline-block; width: 100px; height: 20px;"></span> |
| Overall Final Reclamation <span style="border: 1px solid black; display: inline-block; width: 150px; height: 20px;"></span> | 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. There is an erosion channel at the north side of the location which is transporting sediment offsite. Previous corrective actions have not been completed.

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   |
|--------------|-------------------|---|
| 713600595    | Inspection Photos | <a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390066">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6390066</a> |