

FORM  
INSPRev  
X/20State of Colorado  
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

01/24/2024

Submitted Date:

01/30/2024

Document Number:

708200895

## FIELD INSPECTION FORM

 Loc ID 312292 Inspector Name: Edwardson, Dylan On-Site Inspection  2A Doc Num: \_\_\_\_\_
**Status Summary:**

- THIS IS A FOLLOW UP INSPECTION  
 FOLLOW UP INSPECTION REQUIRED  
 NO FOLLOW UP INSPECTION REQUIRED

**Operator Information:**
 OGCC Operator Number: 95620  
 Name of Operator: WESTERN OPERATING COMPANY  
 Address: 1165 DELAWARE STREET #200  
 City: DENVER State: CO Zip: 80204
**Findings:**

- 8 Number of Comments  
5 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		steve@westernoperating.com	
Fischer, Alex		alex.fischer@state.co.us	
Lindley, Trent		trent.lindley@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Waggoner, Kyle		kyle.waggoner@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	RI
312292	LOCATION	AC			-	PROPST-611N53W 27NESE	RI

**General Comment:**

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and FIR (doc #708200706). This location has an associated AOC with Order NO. (1V-870).

Refer to Environmental Field Inspection Report (Doc #709100206) for additional information.

**Location**

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

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

**Good Housekeeping:**

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (e.g. fencing materials, cattle panels, etc) were observed on location. This was previously documented on on FIR (doc 708200706).		
Corrective Action:	Comply with Rule 606 to remove unused equipment or reinstall. Corrective action date is being backdated to when the location was first observed out of compliance.		Date: 11/27/2023
Type	STORAGE OF SUPL		
Comment:	Previous inspection (doc #708200706) documented a bulldozer being stored on location. At the time of this inspection, the bulldozer has been removed from the location.		
Corrective Action:			Date:

Overall Good:

**Spills:**

Type	Area	Volume		

In Containment: No

Comment:

Multiple Spills and Releases?

**Equipment:**

Type:	#		corrective date
Comment:	Previous comment (doc #708200706; 11/27/2023): No wildlife exclusion device (e.g. netting) observed around day tank secondary containment at the wellhead. At the time of this inspection, Staff observed that wildlife netting has been installed around the day tank secondary containment.		
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: RI

Facility ID: 312292 Type: LOCATION API Number: - Status: AC Insp. Status: RI

**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 \_\_\_\_\_ Fail \_\_\_\_\_

Comment **This location does not comply with Rule 1002.c. During this inspection, Staff observed that new disturbances (approx. 1 acre in size) were occurring outside of the location with two stockpiles (approx. 4000 CY each) of soil observed within impacted salt kill areas (south and west of pit). Stockpiled soils do not appear to be properly stabilized as material has been left unconsolidated. Additional stabilization BMPs are required to prevent wind and water erosion degradation on the stockpiled soils and at the excavation sites. Refer to attached inspection photos.**

Corrective Action **Comply with Rule 1002.c. The location will remain out of compliance until the corrective action has been resolved.**

Date **01/24/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_ Fail \_\_\_\_\_

Comment **Previous inspections (doc #696105387 and 708200706) documented that vehicle traffic is occurring outside of the lease roads. During this inspection, Staff observed new disturbances resulting from excavation of the pit and western salt kill area, in addition to vehicle traffic south of the location leading towards the stockpiled soils. These disturbances have not been approved with an updated Form 2A, nor has there been an approved F27 for the excavation of the pit or salt kill areas. The excavated areas are approx. 0.5 acre each (or approx. 1 acre in total) and each stockpile is approx. 4000 CY of soil. Refer to attached inspection photos for documentation.**

Corrective Action **Operator shall abide by the reclamation rules to minimize surface disturbances per Rule 1002.e. Inform any contractors and personnel about restrictive off site travel (original CA date of 10/16/2023 when the location was first observed out of compliance).**

Date **10/16/2023**

**Comply with Rule 304 to submit an updated Form 2A (oil and Gas Location Assessment) to ECMC to increase the existing Oil and Gas Location to include the new land disturbances (approx. 1 acre). The location will remain out of compliance until the corrective action has been resolved.**

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? Fail

Production areas stabilized ? Fail

1003c. Compacted areas have been cross ripped? \_\_\_\_\_

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 

This location does not comply with Rule 1003. It does not appear any additional reclamation activities have been performed since the previous inspection(s) and the Operator has not submitted any FIRR in response to this compliance issue. At the time of this inspection, it appears that the Operator has excavated the pit (#256303) and placed the impacted material (~4000CY and ~0.5 acre) outside of the location and south of the pit. Additionally, the salt kill area west of the pit was in the process of being excavated and stockpiled west of the location (~4000CY and ~0.5 acre). The Operator has not provided any documentation or communication to Staff explaining the excavations. Refer to attached inspection photos.

Corrective Action 

Comply with Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

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: 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. Additionally, Staff observed that two new disturbances have occurred to the south and to the west of the pit. Stormwater BMPs (e.g. berm) has been left unconsolidated on the southern stockpile and the western stockpile/excavation does not have any apparent stormwater BMPs. Stormwater control measures/BMPs at this location remain inadequate. Refer to attached inspection photos.

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	

**Attached Documents**

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

Document Num	Description	URL
708200901	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6412916">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6412916</a>