

Interim Reclamation and Stormwater Inspection

Date: 03/20/2024

Operator: WESTERN OPERATING COMPANY - 95620

Location ID: 312292

Inspection Document #: 708201014

Logan County, CO

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COLORADO
Energy & Carbon Management
Commission
Department of Natural Resources

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Photo 1. Taken south of the vertical heater treater. Straw wattles have been staked in place but do not appear to be installed per good engineering practices (e.g. trenched and backfilled). Soils remain bare/exposed and are susceptible to wind and water erosion degradation.

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Photo 2. Stockpiled materials on the working pad surface are not properly identified as the writing on the white sign was illegible.



Photo 3. Unused equipment (e.g. fencing) observed on location. All fencing materials need to be removed or returned to service.

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Photo 4. Erosion degradation on the east side of the pit. No stormwater control measures/BMPs observed.

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Photo 5. Degraded straw wattles are considered debris as they're beginning to fill with sediment and are no longer adequate or in proper working condition. Also pictured in background (red circle), fencing materials are considered unused equipment and need to be removed or returned to service.



Photo 6. Evidence of vehicle traffic observed east of the pit has left the soil unstabilized; the implementation of stormwater control measures/BMPs and/or reclamation activities are required to prevent erosion degradation.

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Photo 7. Continued from Photo 6.



Photo 8. East side of stockpiled pit soils. Photo illustrates that both the stockpile and berms have been left unconsolidated. Unconsolidated materials can become a potential pollution source as it is not properly stabilized.



Photo 9. Close up of unconsolidated soils.

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Photo 10. An area approximately 0.50 acres in size has been excavated south of the pit and stockpile. No evidence of stormwater controls measures were observed around the perimeter of the excavated salt kill impacted area.

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Photo 11. Facing northeast; see comments in Photo 10.

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Photo 12. West side of the southern topsoil stockpile; see comments in Photo 8.

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Photo 13. Overview of excavated pit and salt kill area. Soils do not appear to be properly stabilized from wind and water erosion degradation.

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Photos 14 & 15. Overview of excavated pit and salt kill areas; see comments in Photo 13.



Photo 16. Additional disturbance observed south of the salt kill impacted areas. Any disturbance will need to be reclaimed per the reclamation rules as the area is now susceptible to wind and water erosion degradation.



Photo 17. North side of excavation. No stormwater control measures were observed around the perimeter of the excavated area that would prevent off location stormwater discharge from entering nearby drainage (indicated by red arrow).



Photo 18. Continued from Photo 17. Photo illustrates unconsolidated materials with no apparent stormwater control measures.

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Photo 19. Continued from Photo 17 & 18; taken from nearby drainage. No perimeter stormwater control measures observed around the excavated areas or stockpiled material.

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Photo 20. At the time of this inspection, Staff observed a new excavation extending to the western portions of the salt kill impacted area. No apparent stormwater control measures were observed around the perimeter of the excavation and soils have been left unconsolidated.

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Photo 21. Taken within the western most portion of the excavation identified in Photo 20. Stockpiled material pictured in background.



Photo 22. Continued from Photo 21. Western stockpiled material is not properly stabilized with evidence of unconsolidated materials.

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Photo 23. Unused fencing material needs to be removed from the location or returned to service as it poses a potential hazard to personnel, livestock and wildlife resources.

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Photo 24. Taken from the north side of the pit. It does not appear that any erosion degradation has been properly stabilized or repaired, and stormwater control measure remain inadequate as the straw wattles are either degraded or not installed properly.



Photo 25. Continued from Photo 24; close up of degraded stormwater BMPs.



Photo 26. Continued from Photo 24; erosion degradation has not been repaired or stabilized.



Photo 27. Continued from Photo 24; erosion degradation has not been repaired or stabilized.



Photo 28. Taken east of the location along adjacent access road, illustrating traffic disturbance occurring outside of the permitted access roads. Red line illustrates vehicle traffic and associated disturbance that will need to be reclaimed per the reclamation rules.

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Photo 29. Drone aerial imagery captured 03/20/2024. Red shaded outlines illustrate (approx. 1.5 acres) of excavation within the former pit and salt kill areas. Purple shaded outlines (approx 0.75 acres, combined) indicate the soil stockpiles which are approximately 6300 CY in total (2700 CY for west stockpile and 3600 CY for east/south stockpile).

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Photo 30. Drone aerial imagery captured 03/20/2024. Blue shaded outline illustrates a disturbance area of approximately 3.10 acres (excavation, stockpiles and salt kill impacted areas).