

**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:

03/20/2024

Submitted Date:

04/02/2024

Document Number:

708201014

**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Edwardson, Dylan 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:**

8 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		steve@westernoperating.com	
Lindley, Trent		trent.lindley@state.co.us	
Elnajdi, Abdul		abdul.elnajdi@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Fischer, Alex		alex.fischer@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
100311	PIT	AC			-	PROPST 2B	RI
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	RI
256303	PIT	AC			-	PROPST B-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 #708200895 conducted on 01/24/2024). This location has an associated AOC with Order NO. (1V-870).

Refer to Environmental Field Inspection Report (Doc #709100246) for additional information.

**Location**Overall Good: ☐

Emergency Contact Number:

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

Type	DEBRIS		
Comment:	Degraded straw wattles observed east of pit are now considered debris.		
Corrective Action:	Comply with Rule 606 and remove debris.		Date: 04/09/2024
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 conducted on 11/27/2023; and doc #708200895 conducted on 01/24/2024). Refer to attached inspection photos for additional.		
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

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment: ☐ Multiple Spills and Releases?**Fencing/:**

Type	OTHER		
Comment:	It appears that the excavation is not properly fenced off to exclude wildlife, livestock and/or personnel; excavation was not attended by the operator at the time of this inspection.		
Corrective Action:	Comply with 913.b(5)B.i to fence or cover open excavations to prevent access when sites are not attended.		Date: 04/09/2024

**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	<u>100311</u>	Type:	<u>PIT</u>	API Number: <u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>	
Facility ID:	<u>221086</u>	Type:	<u>WELL</u>	API Number:	<u>075-09212</u>	Status:	<u>PR</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>256303</u>	Type:	<u>PIT</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>
Facility ID:	<u>312292</u>	Type:	<u>LOCATION</u>	API Number:	<u>-</u>	Status:	<u>AC</u>	Insp. Status:	<u>RI</u>

**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 excavation activities have occurred throughout the former pit and salt kill areas. Impacted material appears to have been stockpiled in two separate locations and have been left unstabilized (e.g. unconsolidated material), and no visible liners observed. 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 corrective action date is being backdated to when the location was observed out of compliance.

Date **01/24/2024**

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

Comment \_\_\_\_\_

Previous inspections (doc #696105387, #708200706 and #708200895) 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 the salt kill area, in addition to vehicle traffic south of the location leading towards the stockpiled soils. These disturbances have not been approved with a F27 work plan for the excavation of the pit or salt kill areas. The total disturbance area represents approx. 3.10 acres, with an excavated area of approx. 1.5 acres in total, and a combined stockpile quantity of approx. 6300 CY (approx. 0.75 acres). 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**

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 ? \_\_\_\_\_

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

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, ECMC Staff observed that pit (#100311), and the impacted salt kill areas, have been excavated and the impacted material has been stockpiled on location. Staff estimates that approx. 1.5 acres has been excavated resulting in two stockpiles totaling approx. 6,300CY of material (approx. 0.75 acres). Drone aerial imagery conducted during this inspection estimates a total disturbance area of 3.10 acres- which includes the salt kill areas, excavation areas and stockpiled soils. 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 \_\_\_\_\_

Cropland: perennial forage \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_

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. Excavated areas and stockpiled materials are not properly stabilized as they have been left unconsolidated, which can become a potential pollutant source. Additionally, there are no apparent perimeter stormwater controls around the excavation areas that would prevent stormwater runoff from entering into adjacent drainages. Refer to attached inspection photos for additional.

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

Document Num	Description	URL
403739580	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491130">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491130</a>
708201092	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491117">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6491117</a>