

**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:

05/02/2024

Submitted Date:

05/08/2024

Document Number:

708201239

FIELD INSPECTION FORMLoc ID 312291 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

ECMC 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

9 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
Kirschner, Steven		steven.kirschner@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
Lindley, Trent		trent.lindley@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	RI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	PROPST 1	RI
312291	LOCATION	AC			-	PROPST-611N53W 26SWSW	RI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312291) and FIR (doc #708201015 conducted on 03/20/2024).

This location has an associated AOC with Order NO. (1V-870).

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: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

OTHER

Comment:

Free fluids observed within secondary containment at day tank. Refer to attached inspection photos.

Corrective Action:

Properly dispose of oily waste in accordance with Rule 905.e.

Date: 05/23/2024Overall Good: ☐**Spills:**

Type

Area

Volume

In Containment: No

Comment:

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

Type

Comment:

Previous Comment from FIR (doc #708201015) "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."

It does not appear that the corrective action has been performed at the time of this inspection, no visible fencing was observed around the open excavation. Refer to attached inspection photos. Original corrective action date remains applicable.

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:	159442	Type:	UIC	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	312291	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	479472	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Environmental			
Spills/Releases:			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:	During this inspection, it was observed that oil staining within injection well shed does not appear to have been properly removed and disposed of as required by previous corrective actions. This was previously documented in Environmental FIR (doc #709100243); original corrective action date remains applicable. Refer to attached inspection photos.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date: 01/05/2023
Reportable: _____	GPS: Lat _____	Long _____	
Proximity to Surface Water: _____	Depth to Ground Water: _____		
Water Well Complaint:			
DWR Receipt Num: _____	Owner Name: _____	GPS : _____	Lat _____ Long _____
Field Parameters:			
Sample Location: _____		Comment: _____	

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 _____ Fail _____

Comment _____

Previous Comment from FIR (doc #708201015) "Staff observed that impacted material had been stockpiled and stored on top of undisturbed vegetation and soil, south of the previously identified salt kill areas. There was no evidence to suggest that topsoil had been separated and stored prior to stockpiling of the impacted materials, nor was there any indication (signage, etc.) of stored topsoil elsewhere on the location. Refer to attached inspection photos for additional information."

It does not appear that the corrective action has been performed at the time of this inspection. Refer to attached inspection photos.

Corrective Action _____

Comply with Rule 1002.b.

Date _____

1002c. PROTECTION OF SOILS _____ Fail _____

Comment _____

Previous Comment from FIR (doc #708201015) "Staff observed a new disturbance/excavation south of and west of pit (#256304) and throughout the previously identified salt kill areas, totalling approx. 0.75 acre in size with an estimated stockpile volume of 2500CY. Stockpiled soil appears to have been placed directly on top of undisturbed soil/vegetation (e.g. soils not impacted by salt kill) and no evidence of an impermeable liner was observed. Additionally, 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 _____

It does not appear that the corrective action has been performed at the time of this inspection. Original corrective action date remains applicable.

Comply with Rule 1002.c.

Date **04/09/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment _____

Previous Comment from FIR (doc #708201015) "Staff observed new disturbances resulting from excavation of the salt kill area (approx. 0.75 acres) and stockpiled soils (approx. 2500CY) placed directly on top of undisturbed reference areas. Vehicle traffic also appears to be occurring outside of established access/lease roads. These disturbances have not been approved under ECMC rules and regulations."

It does not appear that the corrective action has been performed at the time of this inspection. Original corrective action date remains applicable. Refer to attached inspection photos.

Corrective Action _____

Comply with Rule 1002.e. (original CA date of 10/16/2023 when the location was first observed out of compliance).

Comply with Rule 304.a to submit a Form 2A (Oil and Gas Location Assessment) to ECMC to increase the existing Oil and Gas Location to include the new land disturbances (approx. 0.75 acres in size). The location will remain out of compliance until the corrective action has been resolved. Refer to Environmental Inspection (doc #709100243) for additional information.

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 REVEGETATIONCropland

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, ECMC Staff observed that the impacted salt kill areas have been excavated and the impacted material/soil has been stockpiled on adjacent reference areas (e.g undisturbed). The Operator has not provided any documentation or communication to Staff explaining the excavations. All areas impacted by excavation activities will require additional reclamation. 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 _____
	Gravel removed _____	Culverts 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. At the time of this inspection, it does not appear that any additional stormwater control measures/BMPs have been implemented, or any existing erosion degradation has been stabilized and/or repaired. Impacted material has been stockpiled on adjacent undisturbed lands and has been left unconsolidated which can become a potential pollutant source as it is not properly stabilized. The location continues to exhibit erosion degradation from unstabilized soils, improperly installed control measures/BMPs, and the lack of maintenance/control measures for the location. Refer to attached inspection photos for additional information.

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

Type:	Lined:	Pit ID:	Lat:	Long:
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Reference Point: _____ Other: _____ Length: _____ Width: _____

Lining:

Liner Type: _____ Liner Condition: _____

Comment: _____

Corrective Action: _____ Date: _____

Fencing:

Fencing Type: _____ Fencing Condition: _____

Comment: _____

Corrective Action: _____ Date: _____

Netting:

Netting Type: _____ Netting Condition: _____

Comment:	The produced water pit does not have any netting/BMP to exclude entry by wildlife. Refer to attached inspection photos.			Date: 05/15/2024
Corrective Action	Comply with Rule 1202.a(4)B.			
Anchor Trench Present:	Oil Accumulation:		2+ feet Freeboard:	Date:
Comment:				
Corrective Action				
Permit:	Facility ID	Permit Num	Expiration Date	
	256304	846026		

Attached Documents

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

Document Num	Description	URL
708201242	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6541172