

**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:

708201241

FIELD INSPECTION FORMLoc ID 312292 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:

11 Number of Comments

8 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
Lindley, Trent		trent.lindley@state.co.us	
Kirschner, Steven		steven.kirschner@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	
Arthur, Denise		denise.arthur@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
Coleman, Chris		chris.coleman@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	02/22/2021		-	PROPST-611N53W 27NESE	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and FIR (doc #708201014) conducted on 03/02/2024.

Refer to Environmental FIR (doc #709100276) conducted on 04/29/2024 for additional information.

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:	Cigarettes butts were observed throughout the location, including in close proximity to a recent spill/release at the tank battery. Refer to attached inspection photos for examples.		
Corrective Action:	Implement actions to fully comply with Rule 610 regarding fire prevention and protection.	Date:	05/09/2024
Type	DEBRIS		
Comment:	Degraded straw wattles observed east of pit are now considered debris. This was previously documented in FIR (doc #708201014). It does not appear that the corrective action has been addressed. Refer to attached inspection photos; original corrective action date remains.		
Corrective Action:	Comply with Rule 606 and remove debris.	Date:	04/09/2024
Type	OTHER		
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; doc #708200895 conducted on 01/24/2024; and doc #708201014 conducted on 03/20/2024). 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. This was previously documented in FIR (doc #708201014). It does not appear that the corrective action has been addressed; original corrective action date remains. Refer to attached inspection photos.		
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:	100311	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	221086	Type:	WELL	API Number:	075-09212	Status:	PR	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	256303	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	312292	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

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.

It does not appear that the corrective action has been performed since previously documented in FIR (doc #708201014). Original corrective action date remains applicable.

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 FIRs (doc #696105387, #708200706, #708200895 and #708201014) documented that vehicle traffic is occurring outside of the lease roads.

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, remain evident. 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 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

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 previous inspections 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

Permit:	Facility ID	Permit Num	Expiration Date
	256303	846025	
	256303	846025	

ECMC Comments

Comment	User	Date
Comments from Environmental FIR (doc #709100276) "Spill/Releases" section: On April 29th, 2024, at approximately 12:09 PM, ECMC Staff were conducting a routine field inspection of the Propst 2 (Location ID 312292). While on location, Staff observed an active spill/release originating from the tank battery with strong hydrocarbon odors originating from the tank battery area. Staff observed pooling within the tank battery secondary containment with approx 1 ft of freeboard, hydrocarbon flowing on location towards the well/pump jack (API 075-09212) and hydrocarbon misting that had migrated off-location to the south/southeast of the tank battery and vertical heater treater. ECMC Staff contacted the Emergency Contact number at approximately 12:16 PM to inform the Operator of the active spill. The Operator's Emergency Contact (Caleb) explained they would send crews to the location ASAP to shut-in the well. At approximately 1:20 PM, pumpers arrived on location and the pumpjack was shut in at approximately 1:22 PM. At approximately 1:51 PM, containment crews arrived on Location to begin containing the hydrocarbon spill/release. ECMC Staff left the Location at approximately 1:57 PM. Refer to photo documentation for reference. On April 29, 2024, Western reported the spill/release by submitting a Form 19 (Doc#403773224).	edwardsond	05/08/2024

At the time of this inspection, ECMC Staff observed that hydrocarbons from the tank battery secondary containment had been removed and the tank battery was excavated. It was also observed that the off-location areas that were impacted by hydrocarbon misting had been mowed. While on location, Staff also observed trucks bringing in new soil and hauling impacted material off site for disposal at the Pawnee Landfill. Hydrocarbon staining and impacts were observed south/southeast of the tank battery and vertical heater treater. The Operator has submitted a Form 27 (doc #403780797) for the new spill/release. Refer to attached inspection photos and FIR (doc #709100276) for additional information. Operator shall comply with 900 series rules and regulations and continue remediation activities.	edwardsond	05/08/2024	
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Attached Documents

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

Document Num	Description	URL
708201243	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6541173