

**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:

05/08/2024

Submitted Date:

05/16/2024

Document Number:

713601033

FIELD INSPECTION FORMLoc ID 470757 Inspector Name: COSTA, RYAN 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

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
Hart, Dale	719-688-1638	dale@westernoperating.com	
James, Steven	(303) 893-2438	steve@westernoperating.com	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
484587	TANK BATTERY	AC	06/12/2023		-	Pyles 4 Tank Battery	RI

General Comment:

This is a follow up of the previous reclamation inspections and in regard to complaint #403484076.
The previous corrective actions have not been completed and will be referred to enforcement.
Operator is directed to perform corrective actions outlined on this inspection report immediately.

LocationOverall Good: ☐

Emergency Contact Number:

Comment: There was a sign that fell over at one of the tanks that must be reinstalled.

Corrective Action:

Date: _____

Good Housekeeping:

Type	OTHER		
Comment:	There are open hatches on the tanks which could entrap wildlife such as migratory birds. All openings on tanks must be netted to prevent wildlife entry. All unused tanks need to be removed.		
Corrective Action:	Comply with 902.b. and install wildlife protection.	Date:	05/23/2024
Type	OTHER		
Comment:	The heater treator is still laying on the ground since the fire back in January. The burnt treator needs to be removed as it is unused and does not appear to be serviceable.		
Corrective Action:	Comply with Rule 606.	Date:	05/23/2024
Type	UNUSED EQUIPMENT		
Comment:	There is various unused unneeded equipment and supplies stored at the location. Some equipment appears to have been stored for a long duration of time and is not in use for the tank battery facility. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 1003.a. and 606 to remove unused unneeded equipment and supplies stored at the location.	Date:	
Type	DEBRIS		
Comment:	There is various waste and debris on the location which is a fire hazard. Observed tumble weed debris, plastic chemical containers, parts, trash ect. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 606 for Good Housekeeping and Rule 610 Fire Prevention and Protection.	Date:	
Type	TRASH		
Comment:	There is a trash dumpster on location with no lids to contain the trash or to prevent wildlife entry.		
Corrective Action:	Comply with Rule 606.d.	Date:	05/23/2024

Overall Good: ☐

Spills:				
Type	Area	Volume		
Crude Oil				
Comment:	There are stained soils near the tank battery and along the berm (photo 3, 5). There are also oil stained soils at the disconnected pipe of the heater treator. The pipe is not capped to prevent fluids from leaking out. Previous corrective action was not completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.			Date:

In Containment: No

Comment:

☒ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:			
Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	484587	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	RI
Complaint									
Comment:	This is a follow up in regard to complaint #403484076. Complaint states unauthorized use of property as a pipe yard/ junk yard. Building falling down with insulation blowing into pasture. Fence that is in disrepair and cattle in the storage yard. See complaint for full details. It was observed that a storage yard was located at the active Pyles 4 Tank Battery location. There is unused equipment, pipe, and supplies that were not in use for operations of this tank battery location.								
Corrective Action:	See Corrective Actions within this inspection. Corrective actions will remain out of compliance until completed. Provide documentation of Surface Use Agreement and County Permits associated with the storage yard. Access to records is required per Rule 206.							Date:	
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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION **Fail** _____

Comment _____

Corrective Action _____

Date _____

1003a. Waste and Debris removed? **Fail** _____

Comment _____

Corrective Action _____

Date _____

Unused or unneeded equipment onsite? **Fail** _____

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? FailProduction areas stabilized ? Fail1003c. Compacted areas have been cross ripped? Fail

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? _____

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

The tank battery location is being used as an unpermitted storage yard and was never reclaimed. The use of this location as a storage yard is prohibited per the rules. All unused equipment and supplies must be removed and interim reclamation must be performed. All disturbed areas affected by operations, except areas reasonably needed for production operations must be reclaimed per Rule 1003

Corrective Action

Comply with 1003 Rules

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
<div>Comment: There are oil stained soils that have not cleaned up. There are barrels and containers not properly stored with secondary containment or netted to prevent wildlife entry. There is an erosion channel at the north side of the location which is transporting sediment offsite. Previous corrective actions have not been completed.</div> <div>Corrective Action: Install or repair required BMPs per Rule 1002.f.(2) Implement or modify BMPs for improved material handling and spill prevention. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.</div> <div>Date:</div>						
Pits: <input checked="" type="checkbox"/> NO SURFACE INDICATION OF PIT						

Attached Documents

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

Document Num	Description	URL
713601034	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6550587