

Interim Reclamation and Stormwater Inspection

Date: 06/13/2024

Operator: WESTERN OPERATING COMPANY -95620

Location ID: 312292

Inspection Document #: 708201331

Logan County, CO



COLORADO
Energy & Carbon Management
Commission
Department of Natural Resources



Photo 1. The open excavation at the tank battery has been fenced to exclude entry.

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Photo 2. Facing southeast towards the spill/release area where misting occurred on adjacent lands on April 29th, 2024.

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Photo 3. Facing south; see comments in Photo 2.

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Photo 4. Facing southwest; see comments in Photo 2.

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Photo 5. Facing northwest; see comments in Photo 2.

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Photo 6. Facing northeast at the heater treater. Stormwater control measures (straw wattles) do not appear to be installed per good engineering practices (trenched and backfilled) and require maintenance.

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Photo 7. Continued from Photo 6, facing northwest.

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Photo 8. Continued from Photo 6, facing south.

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Photo 9. Sediment deposition observed south of the vertical heater treater. Stormwater control measures remain inadequate to prevent continued erosion degradation.



Photo 10. South of vertical heater treater. Photo illustrates unstabilized soils and lack of proper stormwater controls measures that would prevent erosion degradation.

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Photo 11. Continued from Photo 10. Red polygon illustrates sediment deposition.

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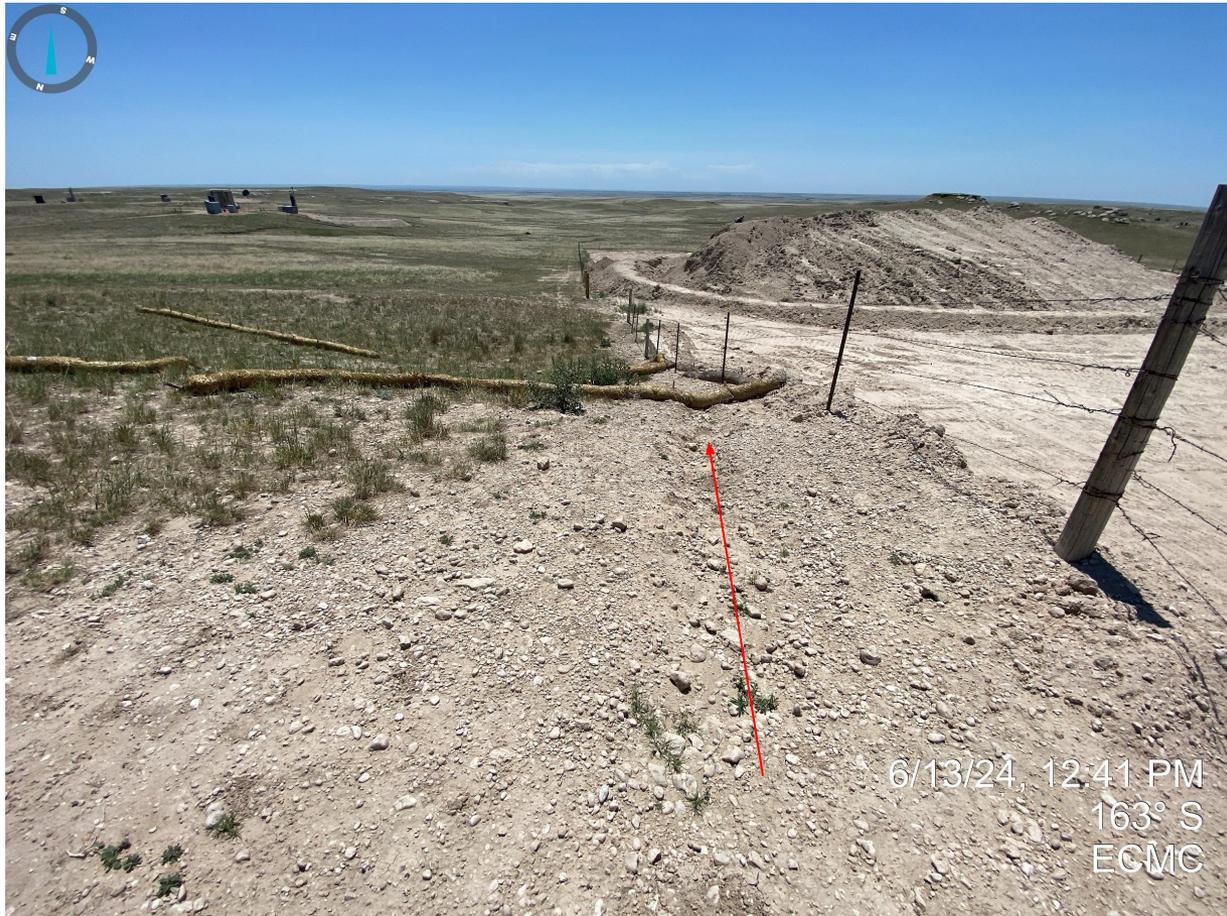


Photo 12. Erosion degradation identified in previous inspection does not appear to have been repaired and stabilized. Degraded straw wattles appear to have been replaced with new wattles, however, the control measures do not appear to have been installed per good engineering practices.



Photo 13. Close up of straw wattles not trenched and backfilled; daylight observed.



Photo 14. Continued from Photo 13.



Photo 15. Straw wattles not properly installed.

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Photo 16. Erosion degradation doesn't appear to have been repaired and stabilized and straw wattles are not adequate.

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Photo 17. 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. Berms also appear to be built out of impacted material from the salt kill/pit excavation.

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Photo 18. Fencing has been installed around the perimeter of the excavation and stockpiled soils. No perimeter stormwater controls/BMPS observed around the stockpiled soils or excavated areas.



Photo 19. Fencing has been installed around the perimeter of the excavation and stockpiled soils. No perimeter stormwater controls/BMPS observed around the stockpiled soils or excavated areas.

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Photo 20. 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.

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Photo 21. Western stockpiled material is not properly stabilized with evidence of unconsolidated materials. No perimeter stormwater control measures observed.



Photo 22. Overview of western most excavation area; the open excavation has been fenced around the perimeter.



Photo 23. North side of excavation. No stormwater control measures/BMPs were observed around the perimeter of the excavated area or stockpiles that would prevent off location stormwater discharge from entering nearby drainage.



Photo 24. Continued from Photo 23. No apparent perimeter stormwater control measures observed. Erosion degradation evident.

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Photo 25. Continued from Photo 23. No apparent perimeter stormwater control measures observed.

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Photo 26. Continued from Photo 23. No stormwater control measures/BMPs were observed around the perimeter of the excavated area or stockpiles that would prevent off location stormwater discharge from entering nearby drainage (indicated by red arrow). Stormwater is close to spilling over the excavated area, indicated by green arrow.

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Photo 27. 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 measures remain inadequate as the straw wattles are degraded and not properly functioning.

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Photo 28. Continued from Photo 27.

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Photo 29. Continued from Photo 27.