

FORM
INSPRev
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:

06/13/2024

Submitted Date:

06/20/2024

Document Number:

708201331

FIELD INSPECTION FORM

Loc ID 312292 Inspector Name: Edwardson, Dylan On-Site Inspection 2A Doc Num: _____

Status Summary:

- THIS IS A FOLLOW UP INSPECTION
 FOLLOW UP INSPECTION REQUIRED
 NO FOLLOW UP INSPECTION REQUIRED

Operator Information:

ECMC Operator Number: 95620
 Name of Operator: WESTERN OPERATING COMPANY
 Address: 1165 DELAWARE STREET #200
 City: DENVER State: CO Zip: 80204

Findings:

- 8 Number of Comments
4 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
Elnajdi, Abdul		abdul.elnajdi@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	
Heibel, Krystal		krystal.heibel@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Fischer, Alex		alex.fischer@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 #708201241) conducted on 05/02/2024.

Refer to Environmental FIR (doc #709100322) conducted on 06/13/2024 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.

Location

Overall Good:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type

OTHER

Comment: The unused equipment (e.g. fencing materials, cattle panels, etc) previously documented in field inspections appears to have been removed from the location or has been reinstalled. Refer to attached inspection photos.

Corrective Action:

Date:

Type

DEBRIS

Comment: The degraded straw wattles observed on the east side of the pit appear to have been removed and replaced with new BMPs. Refer to Stormwater Section for additional information.

Corrective Action:

Date:

Overall Good:

Spills:

Type

Area

Volume

In Containment: No

Comment:

Multiple Spills and Releases?

Fencing/:

Type OTHER

Comment: During this inspection, it was observed that the open excavation has been fenced around the entire perimeter to exclude livestock, wildlife and personnel. Refer to attached inspection photos.

Corrective Action:

Date:

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 #708201241). 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 **Disturbances resulting from excavation of the pit and the salt kill area 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 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 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: Straw wattles appear to have been installed east of the pit since the previous inspection, however, they don't appear to be installed per good engineering practices (e.g. trenched and back-filled) and might have been ripped out by livestock. Degraded straw wattles and erosion degradation observed throughout the location does not appear to have been replaced or repaired. 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 control measures around the excavation areas or stockpiled soils. 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	

Attached Documents

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

Document Num	Description	URL
708201333	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6595522