

**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:

07/29/2024

Submitted Date:

08/05/2024

Document Number:

708201456**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: Edwardson, Dylan On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**ECMC Operator Number: 95620Name of Operator: WESTERN OPERATING COMPANYAddress: 1165 DELAWARE STREET #200City: DENVER State: CO Zip: 80204**Status Summary:**

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

Findings:7 Number of Comments6 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
JAMES, STEVEN		steve@westernoperating.com	
Fischer, Alex		alex.fischer@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Coleman, Chris		chris.coleman@state.co.us	
Heibel, Krystal		krystal.heibel@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 #708201331) conducted on 06/13/2024.

Refer to Environmental FIR (doc #709100349) conducted on 07/29/2024 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.

Location				
Overall Good: <input type="checkbox"/>				
Emergency Contact Number:				
Comment:				Date: _____
Corrective Action:				
Good Housekeeping:				
Type	WEEDS			
Comment:	Undesirable vegetation (kochia, russian thistle) was observed throughout the location including soil stockpiles and excavated areas. Refer to attached inspection photos.			
Corrective Action:	Comply with Rule 606 and and manage undesirable vegetation.			Date: 08/13/2024
Type	UNUSED EQUIPMENT			
Comment:	Unused equipment (secondary containment) at wellhead does not appear to be in use. Refer to attached inspection photos.			
Corrective Action:	Comply with Rule 606 and remove unused equipment.			Date: 08/13/2024
Overall Good: <input type="checkbox"/>				
Spills:				
Type	Area	Volume		
In Containment: No				
Comment: _____				
<input type="checkbox"/> Multiple Spills and Releases?				
Venting:				
Yes/No				
Comment:				
Corrective Action:				Date: _____
Flaring:				
Type				
Comment:				
Corrective Action:				Date: _____

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 #708201331). 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 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:

It does not appear that the corrective actions documented in previous FIRs have been resolved. 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 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

Attached Documents

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

Document Num	Description	URL
403877587	INSPECTION SUBMITTED	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6652706
708201480	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6652702