

**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: _____

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:

- 7 Number of Comments
- 6 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:

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

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:

Spills:

Type	Area	Volume		

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: 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 #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 DISTRURBANCE 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

Corrective Action

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