

**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:

12/04/2024

Submitted Date:

12/13/2024

Document Number:

709100471**FIELD INSPECTION FORM**Loc ID 312291 Inspector Name: Heibel, Krystal 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:11 Number of Comments8 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	(303) 893-2438	steve@westernoperating.com	All Inspections
Krystal Heibel		krystal.heibel@state.co.us	
Alex Fischer		alex.fischer@state.co.us	
Ryan Finley		rfinley@entradainc.com	
Kyle Waggoner		kyle.waggoner@state.co.us	
Dylan Edwardson		dylan.edwardson@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	EI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	PROPST 1	EI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	EI

General Comment:

On December 4, 2024, ECMC Environmental Staff Krystal Heibel conducted an environmental field inspection of Western Operating Company (Western) Probst B #1 (Location ID: 312291).

This location has an associated AOC with Order No. (1V-870). Weather was sunny and windy. For the most recent field inspection report of this facility, please refer to Document #709100441 (Inspection Date: Oct 29, 2024)

The following is a summary: At the time of inspection, Pit Facility ID 256304 had approx. 3" of fluid and fluids were not being disposed of into the pit. Hydrocarbons were not observed around the pit. Prior excavation activity resulted in a stockpile to the south of the pit and an additional stockpile to the west of the pit. It appears this recent excavation has increased the footprint of the oil and gas facility's location.

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"/>					
Signs/Marker:					
Type	WELLHEAD				
Comment:	No signage at wellhead.				
Corrective Action:	Comply with Rule 605.d.				Date: 01/29/2024
Emergency Contact Number:					
Comment:	Emergency Contact number visible from a distance				
Corrective Action:					Date: _____
Good Housekeeping:					
Type	OTHER				
Comment:	During the June 13, 2024, (Doc #709100326) and March 20, 2024 (Doc# 709100243) inspections, additional stockpiles have been added to the south and the west of the location which increased the location's footprint.				
Corrective Action:	Operator shall submit an updated Form 2A (Oil and Gas Location Assessment) to the ECMC to increase the existing Oil and Gas Location, as required by Rule 304.				Date: 03/26/2024
Overall Good: <input type="checkbox"/>					
Spills:					
Type	Area	Volume			
In Containment: No					
Comment:	<p>During the Dec 28, 2023, (Doc #709100197) and March 20, 2024 inspections, water within the pit was a shade of pink/red.</p> <p>Operator shall provide analytical results, sampling for full Table 437-1, Table 915-1, and Table 615.e.(2). (excluding the dissolved gasses and bacteria analysis) for the water within the pit. Water shall also be sampled for Rule 909.j.(1). If analytes are duplicated within the tables, there is no need to duplicate the sampling. Operator shall submit the analytics within the supplemental Form 27 submittal.</p> <p>The Corrective Action date for this was 11/20/2024. Entrada was prepared to collect a sample on October 29, 2024, but were unable to due to the lack of fluids in the pit.</p>				
<input type="checkbox"/> Multiple Spills and Releases?					
Fencing/:					
Type					
Comment:	At the time of the excavation, the the northern area of the fencing around the stockpiled material appeared to be down and not properly fenced off to exclude wildlife, livestock and/or personnel.				
Corrective Action:	Operators will fence or cover open excavations to prevent access when sites are not attended, per Rule 913.b.(5)B.i..				Date: 12/26/2024
Equipment:					
Type:	#				corrective date
Comment:	Valves within both metal sheds and tanks were not plugged.				
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition, inspect at regular intervals and maintain in good mechanical condition per Rule 608.e.				Date: 01/04/2025
Type:	#				
Comment:	During the Aug 3, 2023, inspection, (Doc #709100064) impacted E&P waste was observed directly on the ground near the separator.				
Corrective Action:	Operator shall provide waste manifests for the E&P disposal within a supplemental Form 27 submittal.				Date: 11/20/2023
Type:	#				

Comment:	A 300 bbl steel tank added to site without an impervious synthetic or engineered liner underneath. Secondary containment is not sufficiently impervious to contain spilled or released materials.			
Corrective Action:	Comply with Rule 603.o.(3). Install liner material to ensure spill or released materials will be maintained with containment structure.		Date:	10/06/2024
Type:		#		
Comment:	During the March 20, 2024, inspection, (Doc #709100243), hydrocarbon staining was observed beneath valve and on the north side of tank at its base, indicating a potential leak.			
Corrective Action:	Operator shall document integrity of the structure(tank) within 15 days.		Date:	08/23/2023
Type:		#		
Comment:	Unmarked riser at tank battery.			
Corrective Action:	Maintain active and inactive flowlines and crude oil transfer lines to meet rule 1102.i.		Date:	08/10/2023

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	159442	Type:	UIC	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	221078	Type:	WELL	API Number:	075-09204	Status:	IJ	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									
Facility ID:	479472	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	EI
The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12									

Attached Documents

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

Document Num	Description	URL
709100472	Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6824160