

**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:

11/22/2022

Submitted Date:

12/05/2022

Document Number:

690900217**FIELD INSPECTION FORM**Loc ID 312292 Inspector Name: FISCHER, ALEX On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**OGCC 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:13 Number of Comments10 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
Anderson, Laurel		laurel.anderson@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Edwardson, Dylan		dylan.edwardson@state.co.us	
Binschus, Chris		chris.binschus@state.co.us	
		caitlin.stafford@coag.gov	
James, Steven	(303) 893-2438	steve@westernoperating.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
221086	WELL	PR	03/27/2006	OW	075-09212	PROPST 2	PR
256303	PIT	AC			-	PROPST B-2	AO

General Comment:

On November 22, 2022, COGCC Environmental and Reclamation Staff (Alex Fischer, Alex Ahmadian, Laurel Anderson, Denise Arthur, Chris Binschus, and Dylan Edwardson) conducted environmental and reclamation field inspections of Western Operating Company (Western) Probst B #2 (Location ID: 312292). Weather was clear with a slight breeze and temperature about 45 degrees Fahrenheit. For the most recent field inspection report of this facility, please refer to Document #696105614.

The following is a summary:

- Pit Facility ID 256303 is open and does not appear to be in use;
- Stormwater issues (to be addressed under a separate inspection);
- Reclamation (to be addressed under a separate inspection);
- Housekeeping; and
- Environmental.

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.

LocationOverall Good: ☐

Signs/Marker:			
Type	BATTERY		
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e.	Date:	01/27/2023

Emergency Contact Number:			
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e. and g.		Date: 01/27/2023

Good Housekeeping:			
Type	TRASH		
Comment:	Trash and debris throughout location and in Pit Facility. Cigarette butt within well fence enclosure. Trash near pit. Trash and debris inside of pit (broken glass, spark plugs, shotgun shell casing, metal pipe). Tumble weed accumulation within pit enclosure on south side of pit.		
Corrective Action:	Comply with Rule 606.		Date: 10/12/2017

Overall Good: ☐

Spills:			
Type	Area	Volume	
Crude Oil	Pump Jack	<= 1 bbl	
Comment:	Stuffing box leaking with oil and paraffin accumulation.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date: 12/30/2022
Crude Oil	Separator	<= 1 bbl	
Comment:	Hammer union weeping oil and oil staining on ground.		
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.		Date: 12/29/2022
Other	WELLHEAD		
Comment:	Apparent gas leak at wellhead polish rod and flange (see attached video DSCN1733.MOV). On 11/28/2022 at approximately 13:38 Alex Fischer contacted Mr. Steven James regarding the stuffing box and gas leak. Mr. James stated that he would get crews to fix it ASAP.		
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: 12/15/2022

In Containment: No

Comment: Apparent gas leak at wellhead polish rod and flange (see attached video DSCN1733.MOV). On 11/28/2022 at approximately 13:38 Alex Fischer contacted Mr. Steven James regarding the stuffing box and gas leak. Mr. James stated that he would get crews to fix it ASAP.

☒ Multiple Spills and Releases?**Tanks and Berms:**

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLS	STEEL AST		,

Comment:	Valve handles found on valves with evidence of livestock within fenced tank battery enclosure. The lid on the secondary containment loadout can was found open. Unmarked flowline risers.	
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: 12/13/2022

Paint

Condition	
Other (Content)	
Other (Capacity)	
Other (Type)	

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Berms at tank battery and separator appear to be constructed of earthen material including sand and gravel. Multiple animal burrows were observed to be penetrating the berm(s).			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 912.d.(1).			Date: 12/18/2022

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Location Construction

Location ID: 312292 CDP: _____

Comment: _____

Corrective Action: _____ Date: _____

Form 2A COAs:

Comment: _____

Corrective Action: _____ Date: _____

Wildlife BMPs:

Comment: _____

Corrective Action: _____ Date: _____

Comment: _____

Corrective Action: _____ Date: _____

On Site Inspection (305):

Surface Owner Contact Information:

Name: _____ Address: _____

Phone Number: _____ Cell Phone: _____

Operator Rep. Contact Information:

Landman Name: _____ Phone Number: _____

Date Onsite Request Received: _____ Date of Rule 306 Consultation: _____

Request LGD Attendance: _____

LGD Contact Information:

Name: _____ Phone Number: _____ Agreed to Attend: _____

Summary of Landowner Issues:

Summary of Operator Response to Landowner Issues:

Onsite Inspection Memorandum Summarizing Discussions at Inspection as Attachment:

Inspected Facilities				
Facility ID: 221086	Type: WELL	API Number: 075-09212	Status: PR	Insp. Status: PR
Facility ID: 256303	Type: PIT	API Number: -	Status: AC	Insp. Status: AO

Environmental**Spills/Releases:**

Type of Spill: PRODUCED WATER

Estimated Spill Volume: _____

Comment: F27 Doc 401254702 was submitted on 07/10/2017 to remove a Tinhorn /oil skim culvert, impacted soils and approximately 100,000 square feet of vegetation salt kill. This F27 was approved creating Remediation #10266. F27 Doc #402483626 was submitted 09/08/2020 requesting closure of REM #10266. COGCC EPS, unchecked remediation closure request,"soils do not meet Table 910-1 inorganics in soil levels."NOTE: Based on Water Well Permit #26047, depth to groundwater is app 80' bgs.

Corrective Action: As discussed during the 11/17/2022 virtual meeting between COGCC and Western Operating Company, the Operator agreed to submit a Site Investigation/Remediation Workplan Initial Form 27 and provide a detailed site investigation approach to address the salt kill/release. Additionally, an Initial Form 19 will be required for the salt/kill release. Please include on the Form 27 "Please route to Environmental Supervisor Alex Fischer and Reclamation Specialist Dylan Edwardson." Mr. Fischer also requested a courtesy email at the time the Form 27s are submitted.

Date: 02/17/2020

Reportable: YES

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: 80

Water Well Complaint:

Lat _____ Long _____

DWR Receipt Num: _____ Owner Name: _____ GPS : _____

Field Parameters:

Sample Location: _____ Comment: _____

Spill/Remediation:

Comment: _____

Corrective Action: _____ Date: _____

Emission Control Burner (ECB): _____

Comment: _____

Pilot: _____ Wildlife Protection Devices (fired vessels): _____

Reclamation - Storm Water - Pit

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment

Comment: Corrective Action: Date: **Pits:** ☐ NO SURFACE INDICATION OF PITType: Produced WaterLined: NOPit ID: 256303Lat: 40.896586Long: -103.269408Reference Point: Other: Length: Width: **Lining:**Liner Type: Liner Condition:

Comment:

Form 27 Doc 401254702 was submitted on 07/10/2017 to remove a Tinhorn /oil skim culvert, impacted soils and approximately 100,000 square feet of vegetation salt kill. This Form 27 was approved creating Remediation #10266. Form 27 Doc #402483626 was submitted 09/08/2020 requesting closure of REM #10266. COGCC EPS, unchecked remediation closure request, "soils do not meet Table 910-1 inorganics in soil levels."

Date: 02/17/2020

Corrective Action

As discussed during the 11/17/2022 virtual meeting between COGCC and Western Operating Company, the Operator agreed to submit a Site Investigation/Remediation Workplan Initial F27 and provide a detailed site investigation approach to close Pit Facility ID 256303.

Upon COGCC approval, submit a Supplemental F27 requesting closure of REM #10266 as work will move forward on the newly created REM # for Pit Facility ID 256303.

Submit an Initial Form 27 to close Pit Facility ID 100311. Upon COGCC approval, submit a Supplemental Form 27 requesting closure of the newly created REM # as work will move forward under REM # that will be created for Pit Facility ID: 256303. This will then close Pit Facility ID 100311 in the database

Fencing:Fencing Type: Fencing Condition: Comment:

Corrective

Date: **Netting:**Netting Type: Netting Condition: Comment:

Corrective

Date: Anchor Trench Present: Oil Accumulation: 2+ feet Freeboard: Comment:

Corrective

Date:

Optical Gas Imaging Survey

Survey Type: _____

Current Operations: ☐ Production ☐ Workover ☐ Flowback ☐ Referred to APCD

GPS(entrance of location): Lat: _____ Long: _____

Wind: _____ Speed: _____ (mph) Direction From: _____ Weather: _____ Temperature: (F) _____

Assisting Staff: _____ Camera #: _____

☐ Visible Smoke ☐ Referred to CDPHE

Comment: _____

Corrective Action: _____ Date: _____

COGCC Comments

Comment	User	Date
Please include on the Form 27s "Please route to Environmental Supervisor Alex Fischer and Reclamation Specialist Dylan Edwardson." Mr. Fischer also requested a courtesy email at the time the Form 27s are submitted.	fischera	11/30/2022
See Reclamation Inspection Doc #696105614.		

Attached DocumentsYou can go to COGCC Images (<https://cogcc.state.co.us/weblink/>) and search by document number:

Document Num	Description	URL
403249325	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5932742
690900218	Gas leak at polish rod DSCN1733 (2)	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5932735
690900223	22201122 Photo Log	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5932736