

**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:

690900222**FIELD INSPECTION FORM**Loc ID: 312291 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:**15 Number of Comments12 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
Ahmadian, Alexander		alexander.ahmadian@state.co.us	
Edwardson, Dylan		dylan.edwardson@state.co.us	
James, Steve	(303) 893-2438	steve@westernoperating.com	All Inspections
Binschus, Chris		chris.binschus@state.co.us	
Anderson, Laurel		laurel.anderson@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
		caitlin.stafford@coag.gov	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
100310	PIT				-	PROPST 1A	EI
159442	UIC DISPOSAL	AC	01/16/2014		-	PROPST #1	EI
221078	WELL	IJ	10/01/2020	DSPW	075-09204	Propst 1	EI
256304	PIT	AC			-	PROPST 1-A	EI
479472	TANK BATTERY	AC	02/23/2021		-	PROPST Tank Battery 611N53W /26SWSW	EI

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) Propst 1 A (Location ID: 312291). 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 #696105616.

The following is a summary:

Pit Facility ID 256304 is open currently to be in use (NOTE: HC was observed over approximately 5% of the fluid surface);

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	OTHER		
Comment:	300-bbl tank at pit facility ID 256304 not labeled or placard.		
Corrective Action:	Comply with Rule 605.e.g. and h.	Date:	01/27/2023
Type	BATTERY		
Comment:	Emergency Contact # illegible from a distance.		
Corrective Action:	Comply with Rule 605.e.	Date:	01/27/2023
Type	OTHER		
Comment:	Vertical separator.		
Corrective Action:	Emergency Contact # illegible from a distance.	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	UNUSED EQUIPMENT		
Comment:	A road maintenance piece of equipment containing an open barrel of crude/paraffin was observed south of the heater treater on location. Any unused equipment needs to be removed and the crude/paraffin needs to be properly disposed of as E&P waste		
Corrective Action:	Comply with Rule 606	Date:	12/12/2022
Type	TRASH		
Comment:	Trash and debris throughout Location.		
Corrective Action:	Comply with Rule 606	Date:	12/12/2022

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

Comment:

☐ Multiple Spills and Releases?**Equipment:**

Type:	#		corrective date
Comment:			
Corrective Action:			Date:

Tanks and Berms:

Contents	#	Capacity	Type	Tank ID	SE GPS	
PRODUCED WATER	1	300 BBLs	FIBERGLASS AST		40.893001,-103.264654	
Comment:	Tank not labeled or placard.					
Corrective Action:	Comply with Rule 605.e. and g.					Date: 01/27/2023

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth	Inadequate	Walls Insufficient	Base Insufficient	Inadequate
Comment:	Secondary containment berms around fiberglass tank is not sufficiently impervious to contain spilled or released materials. Secondary containment is inadequate to contain 150% of the volume of the largest tank.			
Corrective Action:	Secondary containment is not sufficiently impervious to contain spilled or released materials. Rule 603.o. Install liner material to ensure spill or released materials will be maintained with containment structure.			Date: 01/04/2023

Contents	#	Capacity	Type	Tank ID	SE GPS
CRUDE OIL	1	300 BBLS	STEEL AST		40.893541,-103.264569
Comment:					
Corrective Action:					Date:

Paint

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

Berms

Type	Capacity	Permeability (Wall)	Permeability (Base)	Maintenance
Earth				
Comment:	Secondary containment is inadequate to contain 150% of the volume of the largest tank.			
Corrective Action:	Repair or install berms or other secondary containment devices per Rule 603.o.			Date: 01/04/2023

Venting:

Yes/No		
Comment:		
Corrective Action:		Date:

Flaring:

Type	
Comment:	
Corrective Action:	Date:

Inspected Facilities				
Facility ID: <u>100310</u>	Type: <u>PIT</u>	API Number: <u>-</u>	Status: <u></u>	Insp. Status: <u>EI</u>
Facility ID: <u>159442</u>	Type: <u>UIC</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>221078</u>	Type: <u>WELL</u>	API Number: <u>075-09204</u>	Status: <u>IJ</u>	Insp. Status: <u>EI</u>
Facility ID: <u>256304</u>	Type: <u>PIT</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>
Facility ID: <u>479472</u>	Type: <u>TANK</u>	API Number: <u>-</u>	Status: <u>AC</u>	Insp. Status: <u>EI</u>

Environmental**Spills/Releases:**

Type of Spill: OIL

Estimated Spill Volume: _____

Comment: Oil staining at wellhead and filter (< 1 bbl). Filter socks both in and out of secondary containment. Valves and fittings weeping oil at well head and tank battery.

Corrective Action: Control and contain spills/releases and clean up per Rule 912.a. Properly store and dispose of used filter socks.

Date: 01/05/2023

Reportable: _____

GPS: Lat _____ Long _____

Proximity to Surface Water: _____

Depth to Ground Water: _____

Water Well Complaint:

Lat _____ Long _____

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

Field Parameters:

Sample Location: _____ Comment: _____

Spill/Remediation:

Comment: After additional review, it has become apparent that the remediation for the spill was originally tied to the remediation and closure of the Propst C1X Skim Pit (Facility ID 100316, Remediation Project #10565). On 5/21/2020, Operator submitted Form 27 #402393553 requesting closure of the skim pit; the Form 27 was approved, effectively closing Remediation Project #10565, though remediation issues and work remained ongoing for the affected spill areas. Therefore, Operator is being required to submit a new Form 27 specifically related to the Produced Water pit (Facility ID 256304), to continue remediation of the spill areas under a sperate Form 19 (new project).

Corrective Action: Operator shall submit an Inital Form 27 to create a remediation project associated with the closure Pit Facility #256304. As part of this Initial Form 27, the operator shall propose the advancement of soil borings and installation of groundwater monitoring wells down gradient of Pit Facility #256304.

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 Form27) providing a detailed site investigation approach to address the salt kill/release. Additionally, an Initial Form 19 will be required for the historic salt/kill release.

It was also discussed that a Site Investigation/Remediation Workplan (Supplemental Form 27) will be required to close the Propst 1A pit, Pit Facility ID: 100310.

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.

Date: 02/17/2020

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: [Pit Facility ID 256304 had approximately 5% hydrocarbon coverage on fluid surface.](#)

Corrective Action: [Per Rule 909.e\(1\) Immediately upon discovery or notification, Operators will remove any accumulation of oil or condensate, including free product or hydrocarbon sheen, from a Pit.](#)

Date: 12/06/2022

Pits: ☐ NO SURFACE INDICATION OF PIT

Permit:	Facility ID	Permit Num	Expiration Date
	256304	846026	

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. See Reclamation Inspection Doc #696105616.	fischera	12/05/2022

Attached Documents

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

Document Num	Description	URL
403250137	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5933439
690900227	20221122 Inspection photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5933438