

**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:

07/06/2023

Submitted Date:

07/07/2023

Document Number:

690204400

**FIELD INSPECTION FORM**Loc ID 324797 Inspector Name: COSTA, RYAN On-Site Inspection ☐ 2A Doc Num: ☐**Operator Information:**

OGCC Operator Number: 95620

Name of Operator: WESTERN OPERATING COMPANY

Address: 1165 DELAWARE STREET #200

City: DENVER State: CO Zip: 80204

**Status Summary:**

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

**Findings:**

5 Number of Comments

4 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
Trujillo, Aaron		aaron.trujillo@state.co.us	
James, Steven D		steve@westernoperating.com	
Sanchez, Chris		chris.sanchez@state.co.us	
Hart, Dale		dale@westernoperating.com	
Kosola, Jason		jason.kosola@state.co.us	
COGCC Enforcement		dnr_cogccenforcement@state.co.us	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
212663	WELL	SI	01/01/2022	OW	061-06023	DAWSON A 1	RI
324797	LOCATION	AC			-	DAWSON A-619S45W 9NENW	RI

**General Comment:**

On 7/6/2023, Ryan Costa conducted a follow up reclamation inspection of the Dawson A 1 tank battery. This is a follow up of the previous inspections; #690203289, #690203496, #690203711, #690203950, #690204224. The corrective actions of the previous reclamation inspections have not been completed. Non-compliance with the Rules will be referred to enforcement. See attached photos and additional details within this report.

**Environmental****Waste Management:**

Type	Management	Condition	GPS (Lat)	(Long)
Oily Soil	Piles	Inadequate		
Comment:	Contaminated soils are not being properly stored with liner and proper secondary containment and need to be removed from the location. E&P Waste not properly stored, handled, transported, treated, recycled, or disposed per Rule 905. Previous corrective action was not completed and must be performed immediately.			
Corrective Action	Immediately Comply with Rule 905.			Date: _____

**Spill/Remediation:**

Comment:	Remediation Project #20712 remains ongoing and excavation has been open for more than 12 months. There was previous spills that had occurred downhill from the tank battery. This impacted area has been excavated with some areas excavated deeper than other areas. There are still areas of oil stained soil at the surface that need to be cleaned up. Additional excavation is needed to remove contaminated soils. Remediation project does not appear to be progressing in a timely manner. Previous corrective action was not completed and must be performed immediately.			
Corrective Action:	Clean up and remove stained soils per Rule 912.a. Properly dispose of oily waste in accordance with 905.e.			Date: _____

Emission Control Burner (ECB): \_\_\_\_\_

Comment: \_\_\_\_\_

Pilot: \_\_\_\_\_ Wildlife Protection Devices (fired vessels): \_\_\_\_\_

**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 \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

1002E. SURFACE DISTURBANCE MINIMIZATION \_\_\_\_\_

Comment \_\_\_\_\_

Corrective Action \_\_\_\_\_

Date \_\_\_\_\_

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? FailProduction areas stabilized ? Fail1003c. Compacted areas have been cross ripped? Fail

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? FailProduction areas have been stabilized? Fail

Segregated soils have been replaced? \_\_\_\_\_

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced \_\_\_\_\_

Recontoured \_\_\_\_\_

Perennial forage re-established \_\_\_\_\_

Non-CroplandTop soil replaced FailRecontoured Fail80% Revegetation Fail

## 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

Remediation Project #20712 remains ongoing and excavation has been open for more than 12 months. Remediation and reclamation does not appear to be progressing. All disturbed areas must be recontoured and reclaimed per 1003 Rules. Soil was imported and stockpiled at the location and has not been stabilized.

Corrective Action

Comply with the 1003 interim reclamation rules.

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 \_\_\_\_\_

Non cropland: Revegetated 80% \_\_\_\_\_

Cropland: perennial forage \_\_\_\_\_

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: Topsol being stored on location is not stabilized and erosion is occurring. There are inadequate stormwater controls installed around the topsoil pile and location. A recent storm event has filled in and overtopped wattles moving sediment offsite. BMP's have not been maintained and no additional BMP's were installed since previous inspection. Previous corrective action was not completed and must be performed immediately.

Corrective Action: Install or repair required BMPs per Rule 1002.f.(2)

Date: 01/06/2023

Pits: ☐ NO SURFACE INDICATION OF PIT

**Attached Documents**

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

Document Num	Description	URL
403457065	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173195">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173195</a>
690204401	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173191">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173191</a>