

**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:

690204402

**FIELD INSPECTION FORM**Loc ID 470757 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:**

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
COGCC Enforcement		dnr_cogccenforcement@state.co.us	
Hart, Dale		dale@westernoperating.com	
Trujillo, Aaron		aaron.trujillo@state.co.us	
James, Steven		steve@westernoperating.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
470757	Location	AC			-	PYLES-619S45W 10SEW	RI
484587	TANK BATTERY	AC	06/12/2023		-	Pyles 4 Tank Battery	RI

**General Comment:**

On 7/6/2023, Ryan Costa conducted a follow up inspection of the Pyles #4 Offsite tank battery location.  
The corrective actions of the previous reclamation inspection have not been completed.  
Non-compliance with the Rules will be referred to enforcement.  
See attached photos and additional details within this report.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment: Corrective Action: Date: **Good Housekeeping:**

Type	DEBRIS		
Comment:	There is various waste and debris on the location. Observed pile of broken concrete, broken tank bottom, bent rusty metal, weed trash debris ect. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 1003.a. and 606 to remove waste and debris		Date: 04/07/2023
Type	OTHER		
Comment:	The shed inside the containment battery is not maintained and metal siding is laying on the ground. Previous corrective action has not been completed.		
Corrective Action:	Maintain in good mechanical condition per Rule 608.e		Date: 04/07/2023
Type	UNUSED EQUIPMENT		
Comment:	There is various unused unneeded equipment and supplies stored at the location. Some equipment appears to have been stored for a long duration of time and is not in use. Previous corrective action has not been completed.		
Corrective Action:	Comply with Rule 1003.a. and 606 to remove unused unneeded equipment and supplies stored at the location.		Date: 04/07/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
Crude Oil	Tank			
Comment:	There was a spill from the backside of the tank battery. There is also stained soil at the pipe outlets that needs to be cleaned up. Previous corrective action has not been completed.			
Corrective Action:	Control and contain spills/releases and clean up per Rule 912.a.			Date: 04/07/2023

In Containment: No

Comment: ☐ Multiple Spills and Releases?**Venting:**

Yes/No			
Comment:			
Corrective Action:		Date:	

**Flaring:**

Type		
Comment:		
Corrective Action:		Date:

**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 **Fail** \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

1003a. Waste and Debris removed? **Fail** \_\_\_\_\_

Comment \_\_\_\_\_

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

Date \_\_\_\_\_

Unused or unneeded equipment onsite? **Fail** \_\_\_\_\_

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? 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? 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 The tank battery location is being used as an unpermitted storage yard and was never reclaimed. The use of this location as a storage yard is prohibited per the rules. All unused equipment and supplies must be removed and interim reclamation must be performed. All disturbed areas affected by operations, except areas reasonably needed for production operations must be reclaimed per Rule 1003. Previous corrective action has not been completed.

Corrective Action Comply with 1003 Rules.

Date 04/15/2023

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 <input type="checkbox"/> Multi-Well Location <input type="checkbox"/>

  

**Storm Water:**

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
				Material Handling And Spill Prevention	Fail	

  

Comment: There are oil stained soils that have not cleaned up. There are barrels and containers not properly stored with secondary containment. Additionally storage is prohibited if not needed for this location and should be removed. Previous corrective action has not been completed.

Corrective Action: Implement or modify BMPs for improved material handling and spill prevention. Conduct maintenance on equipment, cleanup stained material and review self inspection processes.

Date: 03/10/2023

  

**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
403457066	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173196">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173196</a>
690204403	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173193">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6173193</a>