

**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:

01/03/2024

Submitted Date:

01/10/2024

Document Number:

708200849

FIELD INSPECTION FORMLoc ID 313654 Inspector Name: Edwardson, Dylan 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:

11 Number of Comments

10 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
Waggoner, Kyle		kyle.waggoner@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	
Heibel, Krystal		krystal.heibel@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
101089	PIT	AC			-	SAND RIVER UNIT	RI
101090	PIT	AC			-	SAND RIVER UNIT	RI
101091	PIT	AC			-	SAND RIVER UNIT	RI
224744	WELL	PR	05/01/2019	OW	087-05129	PETERSON MAX 6	RI
313654	LOCATION	AC			-	PETERSON MAX-61N56W 27SEW	RI
477262	TANK BATTERY	AC	07/20/2020		-	WESTERN OPRTG CO TANK BATTERY	RI

General Comment:

This is an Interim Reclamation and Stormwater Inspection for Location ID (313654).

LocationOverall Good: ☐

Signs/Marker:			
Type	OTHER		
Comment:	NFPA placard at shed on north end of tank battery is not legible.		
Corrective Action:	Install sign to comply with Rule 605.g. The location will remain out of compliance until the corrective action is resolved.	Date:	01/03/2024

Emergency Contact Number:

Comment:

Corrective Action:

Date: _____

Good Housekeeping:

Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (pumpjack ballasts) being stored at the well location.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	01/03/2024
Type	DEBRIS		
Comment:	Plastic debris observed south of tank battery location.		
Corrective Action:	Comply with Rule 606. The location will remain out of compliance until the corrective action has been resolved.	Date:	01/03/2024
Type	OTHER		
Comment:	Stained soil observed at wellhead and tank battery loadout lines.		
Corrective Action:	Properly dispose of oily waste in accordance with Rule 905.e. The location will remain out of compliance until the corrective action has been resolved.	Date:	01/03/2024

Overall Good: ☐

Spills:				
Type	Area	Volume		

In Containment: No

Comment:

☐ Multiple Spills and Releases?

Equipment:			corrective date
Type: Pump Jack	#		
Comment:	At the time of this inspection, Staff observed that the wellhead had a visible leak at the hammer union, causing staining around well bore. Staff emailed operator on 01/03/2024 to inform of leak and CA to fix equipment. The Operator (Steve James) emailed Staff on 01/04/2024 with photo documentation of repairs to equipment. The Operator is still required to document repairs/resolution to the corrective action with an FIRR submittal.		
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. Provide photo documentation with FIRR submission.		Date: 01/03/2024
Type: Other	#		
Comment:	Day tank at well does not have adequate wildlife exclusion device (e.g. netting) around secondary containment.		
Corrective Action:	Install or repair wildlife protection equipment per Rule 902.b. The location will remain out of compliance until the corrective action has been resolved.		Date: 01/03/2024

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type		
Comment:		
Corrective Action:		Date:

Inspected Facilities									
Facility ID:	101089	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	101090	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	101091	Type:	PIT	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	224744	Type:	WELL	API Number:	087-05129	Status:	PR	Insp. Status:	RI
Facility ID:	313654	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI
Facility ID:	477262	Type:	TANK	API Number:	-	Status:	AC	Insp. Status:	RI

Environmental			
Spills/Releases:			
Type of Spill: _____		Estimated Spill Volume: _____	
Comment:	<div>Evidence of a produced water spill/salt kill was observed west and down gradient of the former pits. Operator shall submit a Form 19 Initial to NE EPS (krystal.heibel@state.co.us). Refer to attached inspection photos for documentation.</div>		
Corrective Action:	<div>Operator shall provide an explanation of the liquids released and calculated volume on the Form 19 Initial Report. (CA date: 01/12/2024).In accordance with 913.d.(1) Operator will investigate impacts to soil, groundwater, and surface water as soon as the impacts are discovered. Per Rule 912.b.(3) Operator will submit a Supplemental Form 19 within 10 Days of spill discovery. (CA date: 01/19/2024)</div>		Date: 01/19/2024
Reportable: _____	GPS: Lat _____	Long _____	
Proximity to Surface Water: _____	Depth to Ground Water: _____		
Water Well Complaint:			
DWR Receipt Num: _____	Owner Name: _____	GPS : _____	Lat _____ Long _____
Field Parameters:			
Sample Location: _____		Comment: _____	

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 _____

Comment _____

Corrective Action _____

Date _____

1002c. PROTECTION OF SOILS _____

Comment _____

Corrective Action _____

Date _____

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment _____

It was observed that vehicle traffic is occurring outside of the established access roads south of the tank battery, possibly due to the access road being severely eroded. Refer to attached inspection photos for examples.

Corrective Action _____

Operator shall abide by the reclamation rules to minimize surface disturbances per Rule 1002.e. Inform any contractors and personnel about restrictive off site travel. Corrective action date is the date the location was observed out of compliance.

Date **01/03/2024**

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? _____ Production areas stabilized ? _____
- 1003c. Compacted areas have been cross ripped? _____
- 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? _____
- Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

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 This location does not comply with Rule 1003. During this inspection, it was observed that interim areas have undesirable vegetation (e.g. russian thistle and kochia) around the tank battery and well location. Additionally, there is a suspected salt kill west and down gradient of the former pits that is evidenced by areas of bare/exposed soils (see also "Spill/Release" section for additional information). Refer to attached inspection photos.

Corrective Action Comply with Rule 1003. The location will remain out of compliance until the corrective action has been resolved.

Date **01/03/2024**

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

Comment:	This location does not comply with Rule 1002.f. The access road to the south of the location, and the northwest corner of the pit, are experiencing severe erosion degradation (e.g. gullyng) with no apparent stormwater control measures to prevent further site degradation. Refer to attached inspection photos for documentation.					Date: 01/03/2024
Corrective Action:	Comply with Rule 1002.f. The location will remain out of compliance until the corrective action has been resolved.					

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
403650752	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6388411
708200870	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6388375