

**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:

01/24/2024

Submitted Date:

01/30/2024

Document Number:

708200895**FIELD INSPECTION FORM**Loc ID: 312292 Inspector Name: Edwardson, Dylan 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:8 Number of Comments5 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
Lindley, Trent		trent.lindley@state.co.us	
Heibel, Krystal		krystal.heibel@state.co.us	
Ferrin, Jeremy		jeremy.ferrin@state.co.us	
Waggoner, Kyle		kyle.waggoner@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	
Fischer, Alex		alex.fischer@state.co.us	
JAMES, STEVEN		steve@westernoperating.com	

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	RI
312292	LOCATION	AC			-	PROPST-611N53W 27NESE	RI

General Comment:

This is a follow-up Interim Reclamation and Stormwater Inspection for Location ID (312292) and FIR (doc #708200706). This location has an associated AOC with Order NO. (1V-870).

Refer to Environmental Field Inspection Report (Doc #709100206) for additional information.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	STORAGE OF SUPL		
Comment:	Previous inspection (doc #708200706) documented a bulldozer being stored on location. At the time of this inspection, the bulldozer has been removed from the location.		
Corrective Action:		Date:	
Type	UNUSED EQUIPMENT		
Comment:	Unused equipment (e.g. fencing materials, cattle panels, etc) were observed on location. This was previously documented on on FIR (doc 708200706).		
Corrective Action:	Comply with Rule 606 to remove unused equipment or reinstall. Corrective action date is being backdated to when the location was first observed out of compliance.		Date: 11/27/2023

Overall Good: ☐**Spills:**

Type	Area	Volume		
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In Containment: No

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

Type:	#		corrective date
Comment:	Previous comment (doc #708200706; 11/27/2023): No wildlife exclusion device (e.g. netting) observed around day tank secondary containment at the wellhead. At the time of this inspection, Staff observed that wildlife netting has been installed around the day tank secondary containment.		
Corrective Action:		Date:	

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities									
Facility ID:	221086	Type:	WELL	API Number:	075-09212	Status:	PR	Insp. Status:	RI
Facility ID:	312292	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI

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 _____ Fail _____

Comment _____

This location does not comply with Rule 1002.c. During this inspection, Staff observed that new disturbances (approx. 1 acre in size) were occurring outside of the location with two stockpiles (approx. 4000 CY each) of soil observed within impacted salt kill areas (south and west of pit). Stockpiled soils do not appear to be properly stabilized as material has been left unconsolidated. Additional stabilization BMPs are required to prevent wind and water erosion degradation on the stockpiled soils and at the excavation sites. Refer to attached inspection photos.

Corrective Action _____

Comply with Rule 1002.c. The location will remain out of compliance until the corrective action has been resolved.

Date **01/24/2024**

1002E. SURFACE DISTURBANCE MINIMIZATION _____ Fail _____

Comment _____

Previous inspections (doc #696105387 and 708200706) documented that vehicle traffic is occurring outside of the lease roads. During this inspection, Staff observed new disturbances resulting from excavation of the pit and western salt kill area, in addition to vehicle traffic south of the location leading towards the stockpiled soils. These disturbances have not been approved with an updated Form 2A, nor has there been an approved F27 for the excavation of the pit or salt kill areas. The excavated areas are approx. 0.5 acre each (or approx. 1 acre in total) and each stockpile is approx. 4000 CY of soil. Refer to attached inspection photos for documentation.

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 (original CA date of 10/16/2023 when the location was first observed out of compliance).

Comply with Rule 304 to submit an updated Form 2A (oil and Gas Location Assessment) to ECMC to increase the existing Oil and Gas Location to include the new land disturbances (approx. 1 acre). The location will remain out of compliance until the corrective action has been resolved.

Date **10/16/2023**

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? **Fail**Production areas stabilized ? **Fail**

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? **Fail**

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. It does not appear any additional reclamation activities have been performed since the previous inspection(s) and the Operator has not submitted any FIRR in response to this compliance issue. At the time of this inspection, it appears that the Operator has excavated the pit (#256303) and placed the impacted material (~4000CY and ~0.5 acre) outside of the location and south of the pit. Additionally, the salt kill area west of the pit was in the process of being excavated and stockpiled west of the location (~4000CY and ~0.5 acre). The Operator has not provided any documentation or communication to Staff explaining the excavations. Refer to attached inspection photos.

Corrective Action

Comply with Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

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: <input style="width: 100%;" type="text"/>	
Corrective Action: <input style="width: 100%;" type="text"/>	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
<p>Comment: This location does not comply with Rule 1002.f. It does not appear the Operator has repaired any existing erosion degradation or installed/implemented additional stormwater control measures/BMPs that would prevent further site degradation. Additionally, Staff observed that two new disturbances have occurred to the south and to the west of the pit. Stormwater BMPs (e.g. berm) has been left unconsolidated on the southern stockpile and the western stockpile/excavation does not have any apparent stormwater BMPs. Stormwater control measures/BMPs at this location remain inadequate. Refer to attached inspection photos.</p> <p>Corrective Action: Comply with Rule 1002.f.(2) to install BMPs in accordance with good engineering practices and repair erosion degradation.</p> <p>Date: _____</p>						
Pits: <input type="checkbox"/> 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
403671732	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6412942
708200901	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=6412916