

Director Matt Lepore
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: COGCC Rule 502.b. Variance Request for 1003.b. Interim Reclamation for Delayed Operations for the Simoes 31-30 , API # 05-081-07723, Facility ID 428569
Township 6 North, Range 90 West, 6th P.M.
Section 30: NW/4NE/4
Moffat County, Colorado

Dear Director Lepore:

We would like to respectfully request a variance for an extension of five years to comply with Rule 1003.b. and 1003.e. as outlined in the Notice to Operators dated January 5, 2017. We have received written consent from the surface owner to delay commencement of interim reclamation for a period five years.

Under current market prices, it is not economic to drill or produce any new wells on this location. We hope to resume activity when the market recovers. In an effort to avoid the cost of performing interim reclamation, then subsequently rebuilding the pad to accommodate activity, we would like to delay the commencement of interim reclamation.

Over the next five years we will be awaiting improved commodity prices to drill the well currently permitted for this location. Storm water and noxious weed control will continue to be monitored.

This location is currently in compliance with Rule 1002.f., Rule 1003.a., and Rule 1003.f. Attached to the Form 4 you will find a spreadsheet outlining the estimated cost for a third-party contractor to perform interim reclamation.

Lastly, you will find an executed COGCC Operator Rule 1003 Tolling Agreement, per the NTO.

Should you have any questions, or require any additional information, please do not hesitate to contact me at any time either by phone at (501) 548-0774 or by email at Sydney.Hansen@swn.com.

Sincerely,



Sydney Hansen
Regulatory Analyst



May 1, 2017

To: Director

Colorado Oil and Gas Conservation Commission

I, we, Fernando F. Simoes and Lesley S. Simoes, whose address is 13761 Union Church Road, Summerduck, VA 22742, as owner(s) of the surface land for the SWNPC Simoes 31-30 Well location do hereby consent to, and support, SWN Production Company, LLC in their application to the Colorado Oil and Gas Conservation Commission for an Interim Reclamation Variance Request as provided for by COGCC Rule 1003 A. for a period of five (5) years.

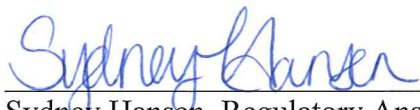


Owner



Owner

As an authorized representative of SWN Production Company, LLC. I, Sydney Hansen, certify that the SIMOES 31-30 location is in compliance with Colorado Oil and Gas Conservation Commission Rule 1002.f., Rule 1003.a., and Rule 1003.f.



Sydney Hansen, Regulatory Analyst



State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303) 894-2100 Fax (303) 894-2109



FOR OGCC USE ONLY

PERFORMANCE BOND

BOND NO: 106658088. This bond is a perpetual instrument which shall remain in force and effect until all obligations have been met and the bond is released by the Colorado Oil and Gas Conservation Commission.

Surety Provider No:

OGCC Oper. No:

FATS No:

KNOW ALL PERSONS BY THESE PRESENTS, That we, SWN PRODUCTION COMPANY, LLC of the County of HARRIS, in the State of TEXAS as principals, and Travelers Casualty and Surety Company of America, as surety, authorized to do business in the State of Colorado, are held hereby and firmly bound unto the State of Colorado, in the penal sum of (\$ 58,000.00), FIFTY EIGHT THOUSAND Dollars, lawful money of the United States, for the faithful payment of which we hereby bind ourselves, our heirs, executors, administrators and assigns.

The condition of this obligation is that whereas the above bounden principals propose the following oil and gas operation(s) on lands situated in the State of Colorado.

Type of Bond	Coverage	Location
<input type="checkbox"/> Plugging <input type="checkbox"/> Surface <input type="checkbox"/> Seismic <input type="checkbox"/> E&P Waste Facility <input type="checkbox"/> Downstream Gas Facilities	<input type="checkbox"/> Blanket <input checked="" type="checkbox"/> Individual <input type="checkbox"/> Plugging 1 well <input checked="" type="checkbox"/> Surface for 1 well <input type="checkbox"/> Irrigated <input checked="" type="checkbox"/> Non-irrigated <input type="checkbox"/> Excess Inactive Wells	<p>Complete for Individual Bonds</p> <p>Well Name and Number: <u>SIMOS 31-30</u></p> <p>Owner of lands where off-site land-treatment facility is located: _____</p> <p>QtrQtr, Sec, Twp, Rng, Meridian: <u>LOT 6, SEC 30, T6N, R90W, 6 PM</u></p> <p>County: <u>MOFFAT</u></p>

NOW, THEREFORE, If the above bounden principals shall comply with all of the provisions of the laws of the State of Colorado and the rules, regulations and requirements of the Oil and Gas Conservation Commission of the State of Colorado, with reference to properly plugging of said well or wells; with reference to land damages and the restoration of the land, as nearly as possible, to its condition at the beginning of the lease; with reference to seismic operations the proper surface restoration and plugging of any shot holes, then this obligation is void; otherwise, the same shall be and remain in full force and effect.

Witness our hands, this 26 day of May, 2017.

Principal: SWN PRODUCTION COMPANY, LLC
 Address: 10000 ENERGY DRIVE
 City: SPRING State: TX Zip: 77389
 Phone: (832) 796-7100 Fax: _____

Signed: Randall Barron

Name Printed: Randall Barron

Surety: Travelers Casualty and Surety Company of America
 Address: One Tower Square
 City: Hartford State: CT Zip: 06183
 Phone: 860-277-0111 Fax: _____

Witness our hands, this 25th day of May, 2017.

Signed: Tannis Mattson

Name Printed: Tannis Mattson, Attorney-in-Fact

Approved: _____
 Director, Oil and Gas Conservation Commission

Bond Release
 Approved: _____
 Director, Oil and Gas Conservation Commission

Dated: _____

Release Date: _____



POWER OF ATTORNEY

Farmington Casualty Company
 Fidelity and Guaranty Insurance Company
 Fidelity and Guaranty Insurance Underwriters, Inc.
 St. Paul Fire and Marine Insurance Company
 St. Paul Guardian Insurance Company

St. Paul Mercury Insurance Company
 Travelers Casualty and Surety Company
 Travelers Casualty and Surety Company of America
 United States Fidelity and Guaranty Company

Attorney-In Fact No.

230577

Certificate No. 007041784

KNOW ALL MEN BY THESE PRESENTS: That Farmington Casualty Company, St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company are corporations duly organized under the laws of the State of Connecticut, that Fidelity and Guaranty Insurance Company is a corporation duly organized under the laws of the State of Iowa, and that Fidelity and Guaranty Insurance Underwriters, Inc., is a corporation duly organized under the laws of the State of Wisconsin (herein collectively called the "Companies"), and that the Companies do hereby make, constitute and appoint

Sandra R. Parker, Melissa Haddick, Gina Rodriguez, Tannis Mattson, Terri L. Morrison, Mary Ann Garcia, and Mario Arzamendi

of the City of Houston, State of Texas, their true and lawful Attorney(s)-in-Fact, each in their separate capacity if more than one is named above, to sign, execute, seal and acknowledge any and all bonds, recognizances, conditional undertakings and other writings obligatory in the nature thereof on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

IN WITNESS WHEREOF, the Companies have caused this instrument to be signed and their corporate seals to be hereto affixed, this 11th day of November, 2016.

Farmington Casualty Company
 Fidelity and Guaranty Insurance Company
 Fidelity and Guaranty Insurance Underwriters, Inc.
 St. Paul Fire and Marine Insurance Company
 St. Paul Guardian Insurance Company

St. Paul Mercury Insurance Company
 Travelers Casualty and Surety Company
 Travelers Casualty and Surety Company of America
 United States Fidelity and Guaranty Company



State of Connecticut
 City of Hartford ss.

By: Robert L. Raney
 Robert L. Raney, Senior Vice President

On this the 11th day of November, 2016, before me personally appeared Robert L. Raney, who acknowledged himself to be the Senior Vice President of Farmington Casualty Company, Fidelity and Guaranty Insurance Company, Fidelity and Guaranty Insurance Underwriters, Inc., St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, Travelers Casualty and Surety Company, Travelers Casualty and Surety Company of America, and United States Fidelity and Guaranty Company, and that he, as such, being authorized so to do, executed the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

In Witness Whereof, I hereunto set my hand and official seal.
 My Commission expires the 30th day of June, 2021.



Marie C. Tetreault
 Marie C. Tetreault, Notary Public



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

COGCC Operator Rule 1003 Tolling Agreement

Operator Name and No. ("Operator"): SWN Production Company, LLC, 10396

Interim Reclamation Variance Request Doc. No.: 401291914

Date of Submission of Interim Reclamation Variance Request: 6/2/2017

Location Nos. Impacted by the Variance Request ("Impacted Locations"): 428569 & 428570

This Agreement is offered by COGCC so that the Operator has an opportunity to come into compliance in accordance with its Interim Reclamation Variance Request.

If the Interim Reclamation Variance Request referenced above is approved ("Approved Variance"), COGCC agrees not to issue a Notice of Alleged Violation ("NOAV") for a violation of Rule 1003 at the Impacted Locations before the expiration of the Approved Variance. In exchange, the Operator agrees to the following:

The Oil and Gas Conservation Act's statute of limitations, §34-60-115, C.R.S., is tolled for any existing or potential claims related to interim reclamation at the Impacted Locations from the submission date of the approved Variance until the Operator successfully completes interim reclamation in accordance with Rule 1003 or until the expiration of the Approved Variance, whichever occurs first.

COGCC reserves the right to issue an NOAV for a violation of Rule 1003 if the Operator does not comply with the Approved Variance or its conditions of approval.

AGREED TO AND ACCEPTED:

COGCC

Date: _____

Signature

Print Signatory Name and Title

Operator

Date: 6/1/2017

Sydney Hansen
Signature of Authorized Operator Representative

Sydney Hansen, Regulatory Analyst

Print Signatory Name and Title