

**FORM  
INSP**Rev  
X/15**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:

10/01/2018

Submitted Date:

10/22/2018

Document Number:

682504013**FIELD INSPECTION FORM**Loc ID 427955 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**OGCC Operator Number: 10396Name of Operator: SWN PRODUCTION COMPANY LLCAddress: PO BOX 12359City: SPRING State: TX Zip: 77391**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**16 Number of Comments3 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
		Sydney_Hansen@swn.com	

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
427974	WELL	PA	08/28/2015	OW	001-09740	Ewertz Farms 1-58 1-26P	RI

**General Comment:**

This is a final reclamation and stormwater inspection in response to a 1001.c, 502.b reclamation variance request.

Operator submitted doc. Doc. #401312312 requesting a variance to waive select requirements of rule 1004.a. to not reclaim the access road, and ~4.6 acres of the well pad

The Surface Owner Variance Request is approved with the following conditions:

1. Operator shall conduct interim reclamation in accordance with COGCC's 1003 reclamation requirements. Operator will reduce the total area of disturbance for the location to 0.92 acres in size (including cut slopes, berms and stormwater controls) per the location's permitted 2A (document # 400252948) beginning at where the access road meets the pad.

a. The remaining pad left for the surface owner will need to be stabilized with either perennial vegetation that meets the 80% Rule 1004 standard or graveled, and permanent stormwater and erosion control BMPs will need to be implemented.

b. All areas disturbed for oil and gas operations requiring interim reclamation shall be re-contoured/reggraded and revegetated to an (80) percent perennial standard to that of a reference area set by COGCC rule 1004.

i. Collaborate with surface owner to determine final land use for areas subject to interim reclamation.

c. Any cut/fill slopes remaining post interim reclamation will require vegetative stabilization. Vegetation will need to achieve the same eighty (80) percent perennial standards, to that of a reference area, as set by COGCC rule 1004.

2. All corrective actions identified on a field inspection report must be performed by the corrective action date as a condition of approval for this variance until final reclamation is passed.

3. Operator will continue to monitor and manage the site and access road for erosion and noxious weed control until final reclamation is passed.

Please see the "Good Housekeeping", "Reclamation" and "Stormwater" sections of this inspection.

**Location**Overall Good: ☐

Emergency Contact Number:

Comment:

Corrective Action:

Date: \_\_\_\_\_

**Good Housekeeping:**

Type	WEEDS		
Comment:	Canada Thistle (Cirsium arvense) observed on location. This is a Colorado State listed noxious weed that needs to be managed. Plants appear to have matured and seed appears to have dispersed for the year.		
Corrective Action:	Canada thistle need to be controlled at the appropriate time but no later than seedhead maturity in 2019 in accordance with 1003.f..		Date: 06/30/2019

Overall Good: ☐**Spills:**

Type	Area	Volume		
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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: DRY LAND

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? Fail Production areas stabilized ? Fail  
 1003c. Compacted areas have been cross ripped? Fail  
 1003d. Drilling pit closed? Pass 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? Fail Segregated soils have been replaced? Fail

**RESTORATION AND REVEGETATION**Cropland

Top soil replaced Fail Recontoured Fail Perennial forage re-established \_\_\_\_\_

Non-Cropland

Top soil replaced Fail Recontoured Fail 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? F

Comment SEE "COGCC COMMENTS" FOR COMMENTS REGARDING INTERIM RECLAMATION

Corrective Action SEE "COGCC COMMENTS" FOR CORECTIVE ACTIONS REGARDING INTERIM RECLAMATION

Date 12/31/2018

**Overall Interim Reclamation****Final Reclamation/ Abandoned Location:**

Date Final Reclamation Started: \_\_\_\_\_ Date Final Reclamation Completed: \_\_\_\_\_

Final Land Use: DRY LAND

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: For the purpose of the SOVR, interim areas of the location will be subject to COGCC's 1004 reclamation requirements in order for final reclamation to pass.

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

Date \_\_\_\_\_

Overall Final Reclamation		Well Release on Active Location		Multi-Well Location		
<b>Storm Water:</b>						
Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Culverts	Pass					At access roat entrance from county road
Seeding	Fail					Cut/fill slopes. Soil stockpiles
Blankets	Fail					Blanket at ditch on north end of location.
		Ditches	Pass			Ditches along access road
Check Dams	Fail					check dams w/in western pad's perimeter ditch
Waddles	Fail					Wood mulch wattler, South end of pad, degrading.
		Check Dams	Pass			check dams along access road ditch
Gravel	Fail					Gravel on pad
Comment:		SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER				Date: 11/30/2018
Corrective Action:		A large majority of the stormwater concerns observed on location should be addressed during interim reclamation activities. Operator shall install and maintain temporary sormwater and erosion control BMPs on the location to mitigate any additional degradation from occuring to the location and sediment transport off site until interim reclamation has been conducted and more permanent controls (see reclamation) have been installed.				
<b>Pits:</b> <input type="checkbox"/> NO SURFACE INDICATION OF PIT						

<b>COGCC Comments</b>		
Comment	User	Date
<b>INTERIM RECLAMATION- COMMENTS</b>  2A doc. #400252948 states size of disturbance durring construction of this location to be 3.67 acres in size. 2A also states location will be 0.92 acres in size after interim reclamation.  Disturbance area of the location is ~4.5 acres (not including access road).  Location appears to have been over-built durring construction, and interim reclamation does not appear to have been conducted in accordance with 1003 reclamation rules and requirements.  Per COAs within the SOVR sundry doc. #401312312, operator will be required to conduct interim reclamation in accordance with COGCC's 1003 reclamation requirements. Operator will reduce the total area of disturbance for the location to 0.92 acres in size per the location's permitted 2A (document # 400252948) beginning at where the access road meets the pad.	trujilloam	10/11/2018

<p><b>STORMWATER COMMENTS</b></p> <p>Stormwater erosion degradation concerns observed throughout cut slopes on the eastern half of the location. Soil stockpile on the south end of the location remains bare and exposed soil; Large furrows evident in the soil perpendicular to the contour of the slope which have created channels to promote stormwater rill and gully erosion degradation.</p> <p>Gully erosion evident on the NE and SE corners of the pad, and a large gully has formed from the ditch on the north end of the pad; Stormwater runoff from the pad appears to have blown out areas of erosion control blankets and check dams / velocity checks in this section of the ditch.</p> <p>Stormwater runoff has incised the ditch along the west end of the pad, and has cut underneath the pad itself. The undercut/sinkhole appears to exceed 10 feet in depth. Stormwater runoff is forming rill and gully erosion degradation within the ditch on the west end of the pad with erosion degradation cutting eastward into the pad. Stormwater ditch on the western perimeter of the location has filled with sediment and is no longer in proper functioning conduction.</p>	trujilloam	10/11/2018
<p><b>INTERIM RECLAMATION- CORRECTIVE ACTION</b></p> <p>Conduct interim reclamation in accordance with 1003 reclamation requirements, and reduce the area of disturbance for the location to 0.92 acres per 2A doc. #400252948 beginning at where the access road meets the pad. Ensure that the remaining pad left for the surface owner is stabilized with either perennial vegetation that meets the 80% Rule 1004 standard or graveled, and permanent stormwater and erosion control BMPs will need to be implemented; BMPs will need to be monitored and maintained until final reclamation has passed in accordance with 1002.f(2).</p> <p>All areas disturbed for oil and gas operations requiring interim reclamation shall be re-contoured/reggraded and revegetated to an (80) percent perennial standard to that of a reference area set by COGCC rule 1004. Operator shall collaborate with surface owner to determine final land use for areas subject to interim reclamation.</p> <p>Any cut/fill slopes remaining post interim reclamation will require vegetative stabilization. Vegetation will need to achieve the same eighty (80) percent perennial standards, to that of a reference area, as set by COGCC rule 1004. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS and ensure erosion controls are implemented to stabilize areas with seeded soil.</p>	trujilloam	10/11/2018

**Attached Documents**

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

Document Num	Description	URL
401805555	INSPECTION SUBMITTED	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617451">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617451</a>
682504050	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617448">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4617448</a>