

**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:

05/06/2019

Submitted Date:

05/09/2019

Document Number:

696200023

FIELD INSPECTION FORM
 Loc ID 427955 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num:
Operator Information:

OGCC Operator Number: 10396

Name of Operator: SWN PRODUCTION COMPANY LLC

Address: PO BOX 12359

City: SPRING State: TX Zip: 77391

Status Summary:

- ☒ THIS IS A FOLLOW UP INSPECTION
- ☒ FOLLOW UP INSPECTION REQUIRED
- ☐ NO FOLLOW UP INSPECTION REQUIRED

Findings:

15 Number of Comments

3 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
		karen_maneotis@swn.com	
		sydney_hansen@swn.com	
Gillette, Kira		kira.gillette@state.co.us	
,		dnr_cogccenforcement@state.co.us	
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		ruthann_alford@swn.com	
		dayonne_alcantar@swn.com	
		denise.arthur@state.co.us	

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
440968	SPILL OR RELEASE	CL	08/28/2015		-	SPILL/RELEASE POINT	RI

General Comment:

This is a follow-up final reclamation and stormwater inspection to doc. #682504013, #682504411 and #682504560

This Inspection is also a follow up for a 1001.c, 502.b reclamation variance request and to document compliance for the following corrective actions:

1003.f: Noxious weed management

1003: Interim reclamation

1002.f: Stormwater management

See "COGCC Comments" for comments regarding the 502.b variance, or sundry doc. #401312312 for additional details.

Any corrective action(s) from previous inspections that have not been addressed are still applicable.

LocationOverall Good: ☐

Emergency Contact Number:

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

Type	WEEDS		
Comment:	<p>Inspection #682504013 and #682504411 documented Canada Thistle (Cirsium arvense) on the location and required management by 6/30/2019. Thistle remains evident and has expanded throughout the majority western half of the location. This is a Colorado State listed noxious weed that needs to be managed.</p> <p>Inspection required operator to conduct weed management. This corrective action remains applicable.</p>		
Corrective Action:	Canada thistle needs 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:

Inspected Facilities									
Facility ID:	427974	Type:	WELL	API Number:	001-09740	Status:	PA	Insp. Status:	RI
Facility ID:	440968	Type:	SPILL OR	API Number:	-	Status:	CL	Insp. Status:	RI

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? _____
 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? Fail Segregated soils have been replaced? Fail

RESTORATION AND REVEGETATIONCropland

Top soil replaced _____ Recontoured _____ Perennial forage re-established _____

Non-Cropland

Top soil replaced Fail Recontoured Fail 80% Revegetation Fail

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 Fail

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: _____

Corrective Action: _____

Date _____

Overall Final Reclamation _____

Well Release on Active Location ☐

Multi-Well Location ☐

Storm Water:

Loc Erosion BMPs	BMP Maintenance	Lease Road Erosion BMPs	Lease BMP Maintenance	Chemical BMPs	Chemical BMP Maintenance	Comment
Ditches	Fail					Perimeter ditch of pad
Check Dams	Fail					Check dams w/in western end of pad
Seeding	Fail					Cut/fill slopes.
Ditches	Fail					Perimeter ditch of location
Gravel	Fail					Gravel on pad
Blankets	Fail					Blanket at ditch on north
Waddles	Fail					Wood mulch wattle, South end of the pad

Comment: [SEE "COGCC COMMENTS" FOR COMMENTS REGARDING STORMWATER](#)

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 stormwater and erosion control BMPs on the location to mitigate any additional degradation from occurring to the location and sediment transport off site until interim reclamation has been conducted and more permanent controls \(see reclamation\) have been installed.](#)

Date: 11/30/2018

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>STORMWATER COMMENTS</p> <p>Stormwater erosion degradation concerns documented in inspection #682504013, #682504411 and #682504560 have not been addressed; Ongoing stormwater management is not occurring, and erosion degradation has not been repaired, stabilized and has been allowed to continue throughout the location.</p> <p>Erosion degradation has continued and expanded 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 previously documented perpendicular to the contour of the slope remain evident. Furrows have developed into rill and gully erosion degradation.</p> <p>Gully erosion documented on the NE and SE corners of the pad remains evident.</p> <p>The large gully within the ditch on the north end of the pad has not been repaired/stabilized/reclaimed; Stormwater runoff from the pad has blown out areas of erosion control blankets and check dams / velocity checks in this section of the ditch. BMPs have not been repaired/maintained and stabilized or reclaimed.</p> <p>Stormwater runoff within the ditch along the west end of the pad has continued to incise and cut underneath the pad itself creating sinkholes. The undercuts/sinkholes appear to exceed 10 feet in depth. There are now multiple areas within the ditch where this is occurring. BMPs have not been repaired/maintained and stabilized, or reclaimed.</p> <p>Stormwater rill and gully erosion degradation documented within the ditch on the west end of the pad has not been repaired/stabilized and the cutting eastward into the pad has been allowed to continue.</p> <p>Operator has failed to install and maintain temporary and permanent stormwater and erosion control BMPs per corrective actions and COAs. Operator has failed to conduct sufficient and ongoing stormwater management in accordance with 1002.f</p>	trujilloam	05/09/2019

<p>INTERIM RECLAMATION- CORRECTIVE ACTION</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 are 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 recontoured/regraded 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	05/09/2019	
<p>COMMENTS REGARDING THE 502.B VARIANCE</p> <p>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 WAS approved with the following conditions:</p> <p>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.</p> <p>1a. The remaining pad left for the surface owner will need to be stabilized with either perennial vegetation that meets the 80% Rule 1004 standards or graveled, and permanent stormwater and erosion control BMPs will need to be implemented.</p> <p>1b. All areas disturbed for oil and gas operations requiring interim reclamation shall be recontoured/ regraded and revegetated to an (80) percent perennial standard to that of a reference area set by COGCC rule 1004.</p> <p>i. Collaborate with surface owner to determine final land use for areas subject to interim reclamation.</p> <p>1c. 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.</p> <p>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.</p> <p>3. Operator will continue to monitor and manage the site and access road for erosion and noxious weed control until final reclamation is passed.</p>	trujilloam	05/09/2019	

INTERIM RECLAMATION COMMENTS

Inspection doc. #682504013, #682504411 and "Conditions of Approval" (COA) per Surface Owner Variance Request sundry doc. #401312312, required operator to conduct interim reclamation and reduce the total area of disturbance for the location to 0.92 acres in accordance with COGCC's 1003 reclamation requirements beginning at where the access road meets the pad.

No reclamation activities appear to have been conducted; disturbance area of the location has not been reduced and remains ~4.5 acres (not including access road). Location has not been stabilized. Stormwater issues remains (See "Stormwater Comments") Corrective actions from inspection #682504013, #682504411, #682504560 and COAs per sundry doc. #401312312 have not been addressed and remain applicable.

trujilloam

05/09/2019

Attached Documents

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

Document Num	Description	URL
402037857	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819291
696200024	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=4819284