

**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:

07/14/2021

Submitted Date:

07/19/2021

Document Number:

696202946

FIELD INSPECTION FORM

Loc ID 438248 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

Status Summary:

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

Operator Information:

OGCC Operator Number: 10396
Name of Operator: SWN PRODUCTION COMPANY LLC
Address: P.O. BOX 12359
City: SPRING State: TX Zip: 77389

Findings:

- 18 Number of Comments
- 14 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
Waldron, Emily		emily.waldron@state.co.us	
		liz_gee@swn.com	
Kellerby, Shaun		shaun.kellerby@state.co.us	
		megan.adamczyk@state.co.us	
Adamczyk, Megan		swnsandwash@swn.com	All Inspections
Fischer, Alex		alex.fischer@state.co.us	
Neidel, Kris		kris.neidel@state.co.us	
Arthur, Denise		denise.arthur@state.co.us	

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
438235	WELL	PR	01/01/2017	OW	081-07804	DIAMOND T SHEEP 7-92 1-26	RI
438248	LOCATION	AC			-	DIAMOND T SHEEP 7-92 1-26	RI
441231	WELL	PR	08/01/2020	OW	081-07817	DIAMOND T SHEEP 7-92 2-26H35	RI

General Comment:

This inspection is in response to complaint #200449766 (Received 6/29/2021) regarding "dust" and "property damage".

On 7/12/2021, COGCC Reclamation Specialist Trujillo made contact with the complainant (Surface Owner) at 16:11 hours; complainant expressed concerns regarding fugitive dust from the Location and access road, the lack of interim reclamation, as well as noxious and undesirable weedy plant establishment.

COGCC Staff met onsite with complainant on 7/14/2021; it was observed in this inspection that the Location is out of compliance with several COGCC Series Rules including, but not limited to, Safety and Facility Operations Regulations (600 series), Environmental Impact Prevention (900 Series), Reclamation Regulations (1000 Series, including Stormwater), and Protection of Wildlife Resources (1200).

Refer to the "Location", "Environmental", "Reclamation" and "Stormwater" sections of this inspection report for additional details.

Refer to the photo-documentation of the observed compliance issues attached to this report.

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

A follow up inspection on this site will be conducted to ensure the compliance issues have been corrected to comply with COGCC rules.

Location			
Overall Good: <input type="checkbox"/>			
Signs/Marker:			
Type	WELLHEAD		
Comment:	Operator information incorrect on signs throughout Location (well heads, battery, tanks); signage requires updating to designate SWN Production Company LLC as Operator. See photo #27		
Corrective Action:	Comply with 605 Rules- implement signage with correct Operator.	Date:	08/19/2021
Type	TANK LABELS/PLACARDS		
Comment:	Labeling information, including safety information, contents, capacity, NFPA, etc..., observed to be missing or inadequate on several tanks, and containers, throughout the Location. See photos 16, 28		
Corrective Action:	Comply with 605 Rules	Date:	08/19/2021
Emergency Contact Number:			
Comment:	<input type="text"/>		
Corrective Action:	<input type="text"/>		Date: _____
Good Housekeeping:			
Type	DEBRIS		
Comment:	Concrete debris stored on south end of the Location. See photo #8		
Corrective Action:	Comply with Rule 606, and Rule 906.a-d.	Date:	07/26/2021
Type	UNUSED EQUIPMENT		
Comment:	Previous inspections documented unused equipment stored on the Location (unused tubing, stock tank, etc..). Inspection required Operator to comply with Rule 603.f (Now Rule 606) by 7/22/2019 It was observed in this inspection that the unused equipment previously identified has not been removed. Additional unused equipment, or equipment not needed for production (tubing/pipe, panels) was observed in this inspection. See photos 22-24 Original corrective action has not been addressed and remains applicable.		
Corrective Action:	Comply with Rule 606	Date:	07/22/2019
Type	OTHER		
Comment:	Impacted soils were observed stored within a stock tank on the northeast end of the Location. Operator shall not collect and store E&P waste on the Location; impacted material requires removal. Stock tank is equipment not necessary for production and requires removal. See photo 19.		
Corrective Action:	Properly dispose of impacted material at an approved Facility and provide waste manifest documentation on a FIRR.	Date:	08/19/2021
Type	DEBRIS		
Comment:	Various debris observed within the secondary containment BMPs of the separator and tank battery facility. See photos 25.		
Corrective Action:	Comply with Rule 606	Date:	07/26/2021

Type	DEBRIS		
Comment:	<p>Previous inspections observed Undesirable Plant Species and weed debris on the Location and within equipment. Inspections required Operator to comply with Rule 603.f (now Rule 606) by 12/8/2020.</p> <p>It was observed in this inspection that weed debris and undesirable plant establishment remain evident on the Location (production and the perimeter disturbance areas) and within equipment. See photos 9</p> <p>Original corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 606	Date:	12/08/2020
Type	WEEDS		
Comment:	<p>Previous inspections documented noxious and undesirable weed establishment (Scotch thistle, Cheat grass, Russian thistle) on the production areas, and the perimeter of the Location. Operator was required to conduct weed management.</p> <p>It was observed in this inspection that weed management has not been performed, or has been inadequate to control/manage weeds on the Location; noxious weeds remain on the Location and appear to be spreading onto the adjacent lands.</p> <p>See photos 5-7.</p> <p>Original corrective action has not been addressed and remains applicable.</p>		
Corrective Action:	Comply with Rule 1003.f and Rule 606.c and conduct weed management on the Location. Operator will be required to remove and dispose plants once they have died and become debris.	Date:	11/30/2020

Overall Good:

Spills:			
Type	Area	Volume	
Comment:	<p>Impacted soils observed throughout the Location:</p> <ul style="list-style-type: none"> -within both compressor sheds on the North end of the Location. See photo 17. -within the secondary containment BMP at the separator equipment. -around the two partially buried tanks between the compressor sheds. See photo 16. -around area of the pump jack muffler. See photo 15. -along the concrete base of the pump jack. See photo 14. -around the scrubber unit on the northeast end of the Location. See photo 18. <p>and other various areas of the production pad.</p>		
Corrective Action:	Securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition; control and contain spills/releases and clean up per Rule 912.a. and remediate to Table 915-1 Cleanup Concentrations; for non-E&P waste comply with Rules 906.a-d		Date: 08/19/2021

In Containment: No

Comment:

Multiple Spills and Releases?

Equipment:			corrective date
Type: Other	#		
Comment:	<p>It was observed in this inspection that wildlife protection devices are missing or insufficient at several secondary containment BMPs, and containers (buckets) on the Location.</p> <p>See photo 28.</p>		
Corrective Action:	Install or repair wildlife protection equipment.		Date: 07/26/2021

Venting:

Yes/No			
Comment:			
Corrective Action:		Date:	

Flaring:

Type			
Comment:			
Corrective Action:		Date:	

Inspected Facilities

Facility ID: 438235 Type: WELL API Number: 081-07804 Status: PR Insp. Status: RI

Facility ID: 438248 Type: LOCATION API Number: - Status: AC Insp. Status: RI

Facility ID: 441231 Type: WELL API Number: 081-07817 Status: PR Insp. Status: RI

Environmental

Spills/Releases:

Type of Spill: _____ Estimated Spill Volume: _____

Comment: Multiple Spill violations were observed in this inspection: An ongoing release of fluids (condensate and paraffin) near stuffing box at well API 05-081-07817); ground surface staining was noted in approximate 6-8 foot diameter area around the wellhead. See photos 12, 13. Impacted material observed throughout the secondary containment of the tank battery facility. Additionally, there appears to be a leak at the bottom of the Produced Water tank #01 (Southeastern most tank in the battery). See photos 20, 21. Operator was contacted by West Environmental Supervisor Alex Fischer on 7/16/2021 and provided notice regarding the ongoing release at API 05-081-07817 of condensate and paraffin, the observed integrity issues at the tank/well, as well as the Form 19 and spill reporting requirements.

Corrective Action: Multiple corrective actions are being provided: 1) Control and contain spills/releases; securely fasten all valves, pipes, fittings, and Production Facilities to ensure good mechanical condition by 7/17/2021. 2) The COGCC is requiring Operator to submit a Form 19 in accordance to the 912 Series rules; a separate Form 19 is required for both the release at the wellhead, and for the tank battery: Comply with 912 on spill reporting including Rule 921.b.(1).E. for impact of 10 cubic yards or more within the tank battery (ie, gravel material within the secondary containment); Contact Area EPS Kris Neidel (kris.neidel@state.co.us) and submit initial Form 19 reports no later than 7/19/2021. 3) All impacted materials must be remediated to Table 915-1 clean-up concentrations; The COGCC will be requiring copies of all disposal manifests. Operator can submit manifests on a F19 (s), or F27 if required.

Date: 07/17/2021

Reportable: YES 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: RANGELAND

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 [Previous inspections observed noxious and undesirable weed establishment on the Location. Noxious weeds and undesirable plant establishment observed remaining on topsoil stockpiles. CA regarding weed management has not been addressed. See "Weeds" regarding weed management. Additionally, Operator has incorporated the topsoil stockpile as part of the stormwater retention pond BMP. This does not comport with Rule 1002.c; Operator has failed to protect topsoil stockpile from degradation, and prevent weed establishment.](#)

Corrective Action [Comply with 1002.c](#) Date **12/08/2020**

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 ? _____
 1003c. Compacted areas have been cross ripped? Fail
 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? Fail

RESTORATION AND REVEGETATION

Cropland

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 It was observed in this inspection the interim reclamation including, but not limited to, compaction alleviation, recontouring/regrading, replacement of topsoil, and revegetation activities have not been conducted on areas of the Location not necessary for production operations. COGCC Records show 11/9/2015 as the "Date of First Production" for the last well to go into production (081-0817) on the Location; pursuant to Rule 1003.b, interim reclamation was required to be completed by 5/9/2016.

See photos 1-4.

Corrective Action Comply with 1003 Rules and conduct interim reclamation on the Location including, but not limited to: compaction alleviation (cross ripping to a minimum depth of 18 inches), recontouring/regrading, replacement of topsoil, and revegetation activities; use a seed mixture provided by the surface owner, or a mixture prescribed by the local soil conservation district. Implement control measures to stabilize the seeded soil in accordance with Rule 1002.d.(2)C. A corrective action date of 5/9/2016 is being provided as this was when interim reclamation was required by pursuant to rule 1003.b.

Date 05/09/2016

Overall Interim Reclamation Fail

Final Reclamation/ Abandoned Location:

Date Final Reclamation Started: _____ Date Final Reclamation Completed: _____

Final Land Use: RANGELAND

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

Comment: Complainant expressed concerns regarding fugitive dust issues from the access road and Location; fugitive dust concerns were not observed along access road at time of inspection due to recent rains; Operator is directed to ensure control measures are in place to mitigate fugitive dust issues along access road.

It was observed in this inspection that BMPs to stabilize/protect the cut slopes of the Location are missing or insufficient; cut slopes exposed- soils observed to be loose/powdery and at risk to wind erosion.

Erosion degradation observed within the ditch along the west end of the Location; stormwater diversion ditch not maintained in proper functioning condition; velocity checks (wattles) not in proper functioning condition.

Corrective Action: See photos 10, 11. Comply with Rule 1002.f.(2)C. Ensure control measures are adequate for the site's conditions, have been installed in accordance with good engineering practices, and are maintained in proper functioning condition.

Date: 07/26/2021

Pits: NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
Trailer with equipment observed stored on the North end of the Location.	trujilloam	07/19/2021
Dead bird observed within secondary containment of the tank battery. See photo 26.	trujilloam	07/19/2021

Attached Documents

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

Document Num	Description	URL
696202950	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5483048