

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
402756537

Date Received:  
07/29/2021

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

14 of 14 CAs from the FIR responded to on this Form

14 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 10396

Name of Operator: SWN PRODUCTION COMPANY LLC

Address: P.O. BOX 12359

City: SPRING State: TX Zip: 77389

Contact Name and Telephone:

Name: \_\_\_\_\_

Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_

Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Waldron, Emily</u>		<u>emily.waldron@state.co.us</u>
<u>Russ Snowden</u>	<u>970-433-8987</u>	<u>russ_snowden@swn.com</u>
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<u>Neidel, Kris</u>		<u>kris.neidel@state.co.us</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 696202946

Inspection Date: 07/14/2021

FIR Submit Date: 07/19/2021

FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: SWN PRODUCTION COMPANY LLC

Company Number: 10396

Address: P.O. BOX 12359

City: SPRING State: TX Zip: 77389

LOCATION - Location ID: 438248

Location Name: DIAMOND T SHEEP 7-92 Number: 1-26 County: \_\_\_\_\_

Qtrqr: NWN Sec: 26 Twp: 7N Range: 92W Meridian: 6  
W

Latitude: 40.534369 Longitude: -107.693036

FACILITY - API Number: 05-081- -00 Facility ID: 438248

Facility Name: DIAMOND T SHEEP 7-92 Number: 1-26

Qtrqr: \_\_\_\_\_ Sec: 26 Twp: 7N Range: 92W Meridian: 6

NWN  
W

Latitude: 40.534369

Longitude: -107.693036

CORRECTIVE ACTIONS:

1 CA# 153901

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

Response: CA COMPLETED

Date of Completion: 07/27/2021

Operator Comment: All equipment has been reviewed for leaks, and has been securely fastened as appropriate. On July 27, 2021, Baggs Testing and Rental performed excavation work in areas where the pad location has been visibly impacted by spills to remediate the site.

Northwest Colorado Consultants will be overseeing the remediation and sampling. They will provide the results of all testing and sample locations to illustrate that the site has been remediated to Table 915-1 clean up concentrations.

We are awaiting on inspector Kris Neidel's guidance on sampling.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

2 CA# 153902

Corrective Action: Comply with 605 Rules- implement signage with correct Operator.

Date: 08/19/2021

Response: CA COMPLETED

Date of Completion: 07/27/2021

Operator Comment: On July 27, 2021, signs noting the operator name as SWN Production Company, LLC have been installed. Reference photos: CA2

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

3 CA# 153903

Corrective Action: Comply with Rule 606, and Rule 906.a-d.

Date: 07/26/2021

Response: CA COMPLETED

Date of Completion: 07/26/2021

Operator Comment: The inspection photo illustrates native rock excavated from location during trenching activities. The rock was stockpiled on site for use in future reclamation operations. Reference photos: CA3

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

4 CA# 153904

Corrective Action: Comply with Rule 606

Date: 07/22/2019

Response: CA COMPLETED

Date of Completion: 07/21/2021

Operator Comment: All unused equipment was removed from the location on July 21, 2021. All equipment was removed, including the tubing, pipe, panels, etc. Reference photos: CA4

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**5** CA# 153905

Corrective Action: Properly dispose of impacted material at an approved Facility and provide waste manifest documentation on a FIRR.

Date: 08/19/2021

Response: CA COMPLETED

Date of Completion: 08/19/2021

Operator Comment: Impacted material will be tested and properly disposed with other impacted soils from location during the remediation activities associated with those spills. At this point in time, we cannot determine at which facility the soil will be disposed. Once laboratory testing is received on the excavated soil material, a landfill facility will be selected and all information, including disposal manifests will be provided to the COGCC.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**6** CA# 153906

Corrective Action: Install or repair wildlife protection equipment.

Date: 07/26/2021

Response: CA COMPLETED

Date of Completion: 07/27/2021

Operator Comment: Wildlife protection devices were installed on location.  
Reference photos: CA6

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**7** CA# 153907

Corrective Action: Comply with Rule 606

Date: 07/26/2021

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: At this point in time, we cannot determine at which facility the soil will be disposed. Once laboratory testing is received on the excavated soil material, a landfill facility will be selected and all information, will be provided to the COGCC.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**8** CA# 153908

Corrective Action: Comply with 605 Rules

Date: 08/19/2021

Response: CA COMPLETED

Date of Completion: 08/07/2021

Operator Comment: At this point in time, all labeling has been done except for one methanol tank. We should receive the label by August 7, 2021.  
Reference photos: CA8

COGCC Decision: \_\_\_\_\_

COGCC  
Representative: \_\_\_\_\_

**9** CA# 153909

Corrective Action: Comply with Rule 606

Date: 12/08/2020

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: Existing undesirable plant species and noxious weeds were sprayed on Monday, July 26, 2021 by Hedges Spraying from Baggs, Wyoming. The undesirable plant species were collected, removed from location and properly disposed at the Moffat County landfill. Reference photos: CA9

COGCC Decision:

COGCC Representative:

**10** CA# 153910

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

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: As noted in the response to comment no. 9, existing undesirable plant species and noxious weeds were sprayed on Monday, July 26, 2021 by Hedges Spraying from Baggs, Wyoming. The undesirable plant species were collected, removed from location and properly disposed at the Moffat County landfill. Reference photos: CA9

COGCC Decision:

COGCC Representative:

**11** CA# 153911

Corrective Action: Multiple corrective actions are being provided:

Date: 07/17/2021

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.

Response: CA COMPLETED

Date of Completion: 07/16/2021

Operator Comment: On May 19, 2021 a drip was noticed from the referenced water tank burner tube. The water line into that tank was shut-in at that time and water was re-directed to the other water tank. At the time, it was estimated that less than 1 barrel (bbl) of produced water had leaked into the secondary containment. Water was hauled out of the tank with the leaking burner tube at this time. On May 25, 2021 the burner tube in the tank was replaced and the tank was put back into service. There has been no known spill from this tank since that time.

The staining of the soil around the wellhead was from a previous leaking from the stuffing box from the wear of the packing. The pump jack was releveled at that time so that it stopped leaking. At that time, the ground was remediated based on visual impact; however, it appears that some staining remained. It was estimated that less than one bbl was spilled to the ground surface.

A Form 19 was filed with the COGCC on July 16, 2021, within 24 hours of COGCC notifying SWNPC of the spills on location. At that time, we had not received the Inspection Report requesting a separate Form 19 – one for the produced water spill at the tank battery and one for the staining at the wellhead. As such, we filed one Form 19 indicating both spills. We have spoken with you about this issue on July 22, 2021 and (indicate what Kris tells us and what we did)confirmed that we will give the facility a maintenance look over, filing an additional Form 19 if 10 cubic yards or more are impacted.

As indicated in the response to CA5, Baggs Testing and Rental will be performing excavation work in areas

where the pad location has been visibly impacted by spills to remediate the site. Northwest Colorado Consultants will be overseeing the remediation and sampling. They will provide the results of all testing and sample locations to illustrate that the site has been remediated to Table 915-1 clean up concentrations.

For preventative measures, a trapperbox was installed on the wellhead.  
Reference photos: CA11

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**12** CA# 153912

Corrective Action: Comply with 1002.c

Date: 12/08/2020

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: As noted in the response to comment no. 9, existing undesirable plant species and noxious weeds were sprayed on Monday, July 26, 2021 by Hedges Spraying from Baggs, Wyoming. The undesirable plant species were collected, removed from location and properly disposed at the Moffat County landfill.  
Reference photos: CA9

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**13** CA# 153913

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

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: The original plan for this site was to drill another well on the pad. This is why interim reclamation was not performed at the time. Currently, we are consulting with a contractor to perform the interim reclamation. Several grading and stormwater issues are being evaluated including the existing stormwater channel addressed in the next corrective action and stockpiling of excess soil from the fill slopes until such time that final reclamation is performed on the site.  
  
Finally, SWNPC is consulting with the landowner's attorney regarding timing of interim reclamation so as not to interfere with the grazing by livestock on the property.

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**14** CA# 153914

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

Response: CA COMPLETED

Date of Completion: 07/29/2021

Operator Comment: Based on the evaluation being performed for the interim reclamation plan, we are evaluating the need for this stormwater channel and will either perform maintenance or reclaim and construct other stormwater controls as necessary. Debris blown onto pad has been removed.  
Reference photos: CA14

COGCC Decision: \_\_\_\_\_

COGCC  
Representative:

**OPERATOR COMMENT AND SUBMITTAL**

Comment: We trust that this information adequately addresses the Commission's request in the Inspection Report at this time.  
Additional information will be provided as noted in this response.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Elizabeth Gee

Signed:

Title: Regulatory Supervisor

Date: 7/29/2021 11:31:57 AM

**ATTACHMENT LIST**

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

<b><u>Document Number</u></b>	<b><u>Description</u></b>
402763820	Sign
402763822	Native Rock
402763823	Cleanup
402763824	Preventative Measure
402763826	Preventative Measure
402763827	Preventative Measure
402763828	Label
402763829	Label
402763830	Label
402763833	Label
402763835	Cleanup
402763840	Cleanup
402763856	Cleanup
402763859	Cleanup
402763860	Cleanup
402763862	Cleanup
402763865	Cleanup
402763866	Preventative Measure
402763869	Cleanup
402763871	Cleanup
402763873	Cleanup

Total Attach: 21 Files