

**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:

05/17/2022

Submitted Date:

05/20/2022

Document Number:

702800234

FIELD INSPECTION FORMLoc ID 428570 Inspector Name: O'Malley, Anna On-Site Inspection ☐ 2A Doc Num: _____**Operator Information:**

OGCC Operator Number: 10396

Name of Operator: SWN PRODUCTION COMPANY LLC

Address: P.O. 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:**

6 Number of Comments

1 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
, SWN		swnsandwash@swn.com	All Inspections
Gee, Elizabeth	(832) 796-2873	liz_gee@swn.com	Principle Agent

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
428570	LOCATION	AC			-	SIMOES 31-30	RI

General Comment:

On 05/17/2022, Reclamation Specialist O'Malley conducted a reclamation and stormwater inspection at SWN Production Company LLC's Simoes /31-30 Location #428570 in Moffat County, Colorado.

The following compliance issues were observed during this inspection:
- Final Reclamation not performed according to 1004 Rules

Refer to the "Reclamation," "Stormwater" and "COGCC Comments" 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.

Inspected Facilities									
Facility ID:	428570	Type:	LOCATION	API Number:	-	Status:	AC	Insp. Status:	RI

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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? _____ Production areas stabilized ? _____

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? _____

Production areas have been stabilized? _____ Segregated soils have been replaced? _____

RESTORATION AND REVEGETATIONCropland

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

Non-Cropland

Top soil replaced _____ Recontoured _____ 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? _____

Comment _____

Corrective Action _____ Date _____

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 _____ In _____ Culverts removed _____

Gravel removed _____ Pass _____

Location and associated production facilities reclaimed _____ Locations, facilities, roads, recontoured _____

Compaction alleviation **Fail** _____ 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:	<p>Refer to the "COGCC Comments" section for additional "FINAL RECLAMATION COMMENTS"</p> <p>It was observed in this inspection the final reclamation activities have been initiated on the Location. At the time of the inspection a dozer was replacing topsoil on the Location. The soil surface where topsoil was being replaced was observed to be highly compacted and difficult to penetrate with a shovel. The Location had not been decompacted per 1004 Rules. Inspector immediately called Russ Snowden of SWN to notify him that cross-ripping to a depth of eighteen inches is required per 1004 Rules. Mr. Snowden immediately stopped the dozer Operator and said decompaction measures would be implemented.</p>	Date 05/01/2022
	<p>Corrective Action #1: Per 1004 Rules, comply with Rule 1003.c. Perform compaction alleviation (cross ripping to a minimum depth of 18 inches).</p> <p>Corrective Action #2: Complete final reclamation activities pursuant to 1004 Rules including, but not limited to, gravel removal, compaction alleviation (cross ripping to a minimum depth of 18 inches), recontouring/regrading, replacement of topsoil, and revegetation activities on the Location and access road. Use a seed mixture provided by the surface owner, or a mixture prescribed by the local soil conservation district.</p>	

Overall Final Reclamation ☐ In Process ☐ 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: At the time of this inspection, no stormwater issues were observed. Ongoing stormwater management is required until the site receives a passing final inspection.

Corrective Action: Date:

Pits: ☐ NO SURFACE INDICATION OF PIT

COGCC Comments

Comment	User	Date
<p>FINAL RECLAMATION COMMENTS</p> <p>Location received a "Notice to Operators: Interim Reclamation Procedures for Delayed Operations" variance request Doc #401291914 to delay interim reclamation for 5 years. Surface owner letter dated 05/01/2017. A corrective action date of 05/01/2022 is being provided as this is when reclamation was required. No wells have been drilled and the permit to drill for the well (API #081-07723) has been abandoned per Doc #402950968. Operator states that "SWN plans to reshape area to the original relative soil positions and contour. We will also reseed disturbed area."</p> <p>Note, reshaping area to the original relative soil positions and contour and reseeding, as stated by the Operator is not sufficient. Complete final reclamation activities in accordance with 1004 Rules.</p>	omalleya	05/20/2022

Attached Documents

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

Document Num	Description	URL
403055712	INSPECTION SUBMITTED	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759205
702800235	Inspection Photos	http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759203