

**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 FORM**

Loc ID: 428570 Inspector Name: O'Malley, Anna 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: 77391-

**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

**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 REVEGETATION

Cropland

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:

	<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>	
Corrective Action:	<p><b>Corrective Action #1: Per 1004 Rules, comply with Rule 1003.c. Perform compaction alleviation (cross ripping to a minimum depth of 18 inches).</b></p> <p><b>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.</b></p>	Date <b>05/01/2022</b>
<p>Overall Final Reclamation    In Process    Well Release on Active Location <input type="checkbox"/>    Multi-Well Location <input type="checkbox"/></p>		

**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

<b>COGCC Comments</b>		
Comment	User	Date
<p><b>FINAL RECLAMATION COMMENTS</b></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	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759205">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759205</a>
702800235	Inspection Photos	<a href="http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759203">http://ogccweblink.state.co.us/DownloadDocumentPDF.aspx?DocumentId=5759203</a>