

State of Colorado  
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203  
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:  
403065516

Date Received:  
06/20/2022

FIR RESOLUTION FORM

Overall Status: CAC

CA Summary:

12 of 12 CAs from the FIR responded to on this Form

12 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: 77391-2359

Contact Name and Telephone:  
Name: \_\_\_\_\_  
Phone: ( ) \_\_\_\_\_ Fax: ( ) \_\_\_\_\_  
Email: \_\_\_\_\_

Additional Operator Contact:

Contact Name	Phone	Email
<u>Russ Snowden</u>	<u>970-433-8987</u>	<u>russ_snowden@swn.com</u>

COGCC INSPECTION SUMMARY:

FIR Document Number: 702800155  
Inspection Date: 04/27/2022 FIR Submit Date: 05/02/2022 FIR Status: \_\_\_\_\_

Inspected Operator Information:

Company Name: SWN PRODUCTION COMPANY LLC Company Number: 10396  
Address: P.O. BOX 12359  
City: SPRING State: TX Zip: 77391-2359

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: NWN Sec: 26 Twp: 7N Range: 92W Meridian: 6  
W  
Latitude: 40.534369 Longitude: -107.693036

CORRECTIVE ACTIONS:

1  CA# 161493

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: 06/01/2022

Response: CA COMPLETED Date of Completion: 09/23/2021

completed

Operator  
Comment:

COGCC Decision: **Not Approved**

COGCC Representative: Operator states that corrective action was completed 9/23/2021. Inspector observed impacted soils throughout the Location in inspection #702800155 dated 4/27/2022.

2  CA# 161494

Corrective Action: Install or repair wildlife protection equipment.

Date: 07/28/2021

Response: CA COMPLETED

Date of Completion: 09/23/2021

Operator  
Comment: See attached photo

COGCC Decision: **Not Approved**

COGCC Representative: Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s) from inspection #702800155 dated 4/27/2022. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

3  CA# 161495

Corrective Action: Implement safety BMPs to properly cover pipe.

Date: 05/07/2022

Response: CA COMPLETED

Date of Completion: 09/23/2021

Operator  
Comment: this was done in September 2021 and Swm no longer owns this property

COGCC Decision: Approved via an AMI

COGCC Representative: Per Inspection #702800155 dated 4/27/22 this corrective action was not completed in September 2021. Inspector observed the uncovered pipe during the 4/27/22 inspection. Per FIRR #403035626, this corrective action was completed 5/4/22 and previously approved via an AMI on 5/24/22.

4  CA# 161496

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: 09/23/2021

Operator  
Comment: Please see attached manifest The work is done.

COGCC Decision: **Not Approved**

COGCC Representative: Operator has not provided adequate documentation to show work has been conducted per corrective action(s); no waste manifest, or haul ticket was provided indicating waste was disposed of at an approved facility. The document provided by the Operator contains a "Waste Characterization and Disposal Acceptance Recommendation" which states "the material appears to meet landfill disposal acceptance criteria." No documentation such as a waste manifest or haul ticket has been provided by the Operator to show waste was actually accepted and disposed of at an approved facility.

5  CA# 161497

Corrective Action: Comply with Rule 606

Date: 05/09/2022

Response: CA COMPLETED

Date of Completion: 05/02/2022

Operator  
Comment: Swm no longer owns this property

COGCC Decision: Approved pending re-inspection

COGCC Representative: Operator comment does not address the corrective action. Document #403042421 "Weed Debris @ South Slope Cleanup" provided on 5/10/22 shows management of weed debris per the corrective action. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

6  CA# 161498

Corrective Action: Conduct weed management to prevent further establishment and spread of Undesirable and Noxious Weed Species in accordance with Rule 1003.f and Rule 606.c. Ongoing weed management required until location passes final reclamation.

Date: 06/01/2022

Response: CA COMPLETED

Date of Completion: 05/25/2022

Operator Comment: Completed

COGCC Decision: **Not Approved**

COGCC Representative: Operator has provided no documentation attached to this resolution to show work has been conducted per corrective action(s). A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

7  CA# 161499

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

Date: 08/19/2021

Response: CA COMPLETED

Date of Completion: 06/20/2022

Operator Comment: Swn No longer owns this property

COGCC Decision: **Not Approved**

COGCC Representative: An Operator response of "Corrective Action Completed" is a notification to the State that the corrective action has been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

Form 09 Subsequent Transfer of Operatorship #403026381 is "In Process". Per COGCC records the Operator of this Location is SWN Production Company LLC #10396.

8  CA# 161500

Corrective Action: Comply with Rule 606.

Date: 07/22/2019

Response: CA COMPLETED

Date of Completion: 06/20/2022

Operator Comment: Swn no longer owns this property

COGCC Decision: **Not Approved**

COGCC Representative: An Operator response of "Corrective Action Completed" is a notification to the State that the corrective action has been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

Form 09 Subsequent Transfer of Operatorship #403026381 is "In Process". Per COGCC records the Operator of this Location is SWN Production Company LLC #10396.

9  CA# 161501

Corrective Action: Comply with 605 Rules.

Date: 08/19/2021

Response: CA COMPLETED

Date of Completion: 06/20/2022

Operator Comment: Swn no longer owns this property

COGCC Decision: **Not Approved**

An Operator response of "Corrective Action Completed" is a notification to the State that the corrective action has

COGCC Representative: been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

Form 09 Subsequent Transfer of Operatorship #403026381 is "In Process". Per COGCC records the Operator of this Location is SWN Production Company LLC #10396.

**10**  CA# 161502

Corrective Action: All impacted materials must be remediated to Table 915-1 clean-up concentrations. Comply with Rule 912.b.(6).B.ii; Submit Form 27 with copies of all disposal manifests attached. Date: 10/12/2021

Response: CA COMPLETED Date of Completion: 09/23/2021

Operator Comment: Please see attached analyticals and waste report

COGCC Decision: **Not Approved**

COGCC Representative: Operator has not provided adequate documentation to show work has been conducted per corrective action(s); no Form 27 has been received and no disposal manifests were provided.

**11**  CA# 161503

Corrective Action: Perform interim reclamation on all areas not reasonably needed for production to the south and southwest of the wells, pursuant to 1003 Rules 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: 05/09/2022

Operator Comment: Please see attached pictures of work completed on 05/09/2022.

COGCC Decision: **Not Approved**

COGCC Representative: Corrective action to perform interim reclamation on all areas not reasonably needed for production to the south and southwest of the wells has not been addressed with this response.

Operator states "Please see attached pictures of work completed on 05/09/2022." No photos have been attached to this FIRR. Photos attached to previous FIRR #403042391 showing work completed on 05/09/2022 show weed debris cleanup.

**12**  CA# 161504

Corrective Action: 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: 09/23/2021

Operator Comment: Swn no longer owns this property

COGCC Decision: **Not Approved**

COGCC Representative: An Operator response of "Corrective Action Completed" is a notification to the State that the corrective action has been addressed in its entirety; The FIR Resolution form: "CA Complete" is not the correct forum to address alleged factual errors. A field inspection will be conducted at a future date to evaluate compliance with COGCC rules.

Form 09 Subsequent Transfer of Operatorship #403026381 is "In Process". Per COGCC records the Operator of this Location is SWN Production Company LLC #10396.

OPERATOR COMMENT AND SUBMITTAL

Comment: The waste manifest is attached

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

Print Name: Karen Maneotis

Signed: \_\_\_\_\_

Title: Regulatory Specialist

Date: 6/20/2022 12:15:37 PM

**ATTACHMENT LIST**

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

<u>Document Number</u>	<u>Description</u>
403065516	FIR RESOLUTION SUBMITTED
403065536	Waste Manifest

Total Attach: 2 Files