

FORM
INSPRev
X/20State of Colorado
Oil and Gas Conservation Commission1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Inspection Date:

08/21/2024

Submitted Date:

09/06/2024

Document Number:

696206198

FIELD INSPECTION FORM

Loc ID 313327 Inspector Name: Trujillo, Aaron On-Site Inspection 2A Doc Num: _____

Operator Information:

ECMC 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
Gee, Elizabeth	(832) 796-2873	liz_gee@swn.com	All Inspections
, SWN		swnsandwash@swn.com	All Inspections
Maneotis, Karen		Karen_Maneotis@swn.com	All Inspections

Inspected Facilities:

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
287343	WELL	PA	05/01/2022	GW	081-07349	SARATOGA 44-3	RI
313327	LOCATION	CL			-	SARATOGA-67N93W 3SESE	RI

General Comment:

On 8/21/2024, Reclamation Specialist Trujillo conducted a final reclamation inspection at SWN Production Company LLC's Saratoga 44-3 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403798680 stating "Final Reclamation Complete".

It was observed in this inspection that reclamation has not been completed pursuant to 1004 requirements.

The following compliance issues were observed during this inspection:

- Reclamation of the access road
- Weeds
- Utility Equipment remaining

Refer to the Reclamation section 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 inspection that have not been addressed are still applicable.

Inspected Facilities

Facility ID: 287343 Type: WELL API Number: 081-07349 Status: PA Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Facility ID: 313327 Type: LOCATION API Number: - Status: CL Insp. Status: RI

The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12

Reclamation - Storm Water - Pit

Interim Reclamation:

Date Interim Reclamation Started: _____ Date Interim Reclamation Completed: _____

Land Use: _____

Comment: _____

1002 SITE PREPARATION AND STABILIZATION

1002a. FENCING _____

Comment _____

Corrective Action _____

Date _____

1002b. SOIL REMOVAL AND _____

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: _____

Reminder: _____

Comment:

Well plugged _____ Pit mouse/rat holes, cellars backfilled _____

Debris removed _____ No disturbance /Location never built _____

Access Roads Regraded **Fail** Contoured **Fail** Culverts removed **Fail**

Gravel removed **Fail**

Location and associated production facilities reclaimed **Fail** Locations, facilities, roads, recontoured **Fail**

Compaction alleviation **Fail** Dust and erosion control _____

Non cropland: Revegetated 80% **Fail** Cropland: perennial forage _____

Weeds present **Fail** 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 **10/15/2024**

Conduct reclamation in accordance with 1004 rules at the Location/Road including, but not limited to removal of utility equipment/culverts/gravel material, compaction alleviation, recontour/regrading and establish vegetation with total perennial, non-invasive uniform plant cover of at least 80% of pre-disturbance or reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local soil conservation district.

Comply with Rule 1002.f and ensure erosion controls are implemented to stabilize the seeded soil. Comply with Rules 1004.e and 606.c: Oil and Gas Locations will be kept free of all Undesirable Plant Species. Ongoing stormwater and weed management required until Final Reclamation has passed.

Overall Final Reclamation **Fail** Well Release on Active Location Multi-Well Location

ECMC Comments

Comment	User	Date
<p>Pursuant to Rule 1004.a, all debris and surface equipment shall be removed within three (3) months of plugging a well. All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and recontoured. Culverts and any other obstructions that were part of the access road(s) shall be removed. Well locations, access roads and associated facilities shall be reclaimed. As applicable, compaction alleviation, restoration, and revegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003. All other equipment, supplies, weeds, rubbish, and other waste material shall be removed. All such reclamation work shall be completed within twelve (12) months on non-crop land after plugging a well or final closure of associated production facilities.</p> <p>It was observed in this inspection that the access road to the Location has not been reclaimed in accordance with ECMC 1004 Rules. Areas on the east end of the Location remain predominantly bare and do not meet 1004.c.(2) standards. Additionally, utility equipment on, and leading to the Location has not been removed. Noxious weeds (Scotch thistle) observed established on the Location. It is noted that species planted do not reflect species within the adjacent undisturbed reference areas, or vegetation that existed pre-disturbance; records show surface owner approved of the mix. Signage on Location posted with incorrect Operator information- signage requires updating/maintenance, or removal.</p>	trujilloam	09/06/2024

Attached Documents

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

Document Num	Description	URL
696206199	Inspection Photos	https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6696367