

**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:

08/21/2024

Submitted Date:

09/06/2024

Document Number:

696206200

**FIELD INSPECTION FORM**Loc ID 313153 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
Maneotis, Karen		Karen_Maneotis@swn.com	<a href="#">All Inspections</a>
Gee, Elizabeth	(832) 796-2873	liz_gee@swn.com	<a href="#">All Inspections</a>
, SWN		swnsandwash@swn.com	<a href="#">All Inspections</a>

**Inspected Facilities:**

Facility ID	Type	Status	Status Date	Well Class	API Num	Facility Name	Insp Status
264315	WELL	PA	06/12/2022	CBM	081-07096	WALKER 3-2	RI
313153	LOCATION	CL			-	WALKER 7-93-3 PAD2	RI

**General Comment:**

On 8/21/2024, Reclamation Specialist Trujillo conducted a final reclamation inspection at SWN Production Company LLC's Walker 3-2 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816931 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
- 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.



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 \_\_\_\_\_

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 \_\_\_\_\_ In Process \_\_\_\_\_ Subsidence \_\_\_\_\_

## 1004.d. FINAL VEGETATION TRANSECT

TRANSECT RESULTS OF DISTURBED AREA% \_\_\_\_\_

TRANSECT RESULTS OF REFERENCE AREA% \_\_\_\_\_

TOTAL % OF DESIRABLE VEGETATION COVER \_\_\_\_\_

VEGETATIVE COVER \_\_\_\_\_

Comment: [See "COGCC Comments" at the end of this report.](#)

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. 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. Additionally, utility equipment on, and leading to the Location has not been removed.</p> <p>It is noted that the access road was utilized for both the Culverwell 3-21 and the Walker 3-2 Locations. Both Operators (SWN and Quicksilver Resources Inc) share responsibility for reclamation of the access road. After review of records, it has been determined that Quicksilver is responsible for the reclamation of the section of access road from the Culverwell 3-21, to the Walker 3-2 Location; and SWN is responsible for the reclamation of the remaining access road that travels Northeast from the Walker 3-2 Location. Refer to inspection #696206202 for additional details.</p> <p>It is ECMC's expectation that both Operators will coordinate to resolve the outstanding compliance issues.</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
696206204	Inspection Photos	<a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6696368">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6696368</a>