

**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:

08/23/2024

Submitted Date:

09/13/2024

Document Number:

696206215**FIELD INSPECTION FORM**Loc ID 311776 Inspector Name: Trujillo, Aaron On-Site Inspection ☐ 2A Doc Num: \_\_\_\_\_**Operator Information:**ECMC Operator Number: 10396Name of Operator: SWN PRODUCTION COMPANY LLCAddress: P.O. BOX 12359City: SPRING State: TX Zip: 77391-**Status Summary:**☐ THIS IS A FOLLOW UP INSPECTION☒ FOLLOW UP INSPECTION REQUIRED☐ NO FOLLOW UP INSPECTION REQUIRED**Findings:**4 Number of Comments1 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 |
|----------------|-------|---------------------------|---------|
|                |       | Karen_Maneotis@swn.com    |         |
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**Inspected Facilities:**

| Facility ID | Type     | Status | Status Date | Well Class | API Num   | Facility Name      | Insp Status |
|-------------|----------|--------|-------------|------------|-----------|--------------------|-------------|
| 282912      | WELL     | PA     | 07/22/2022  | GW         | 081-07273 | BROOK 14-5         | RI          |
| 311776      | LOCATION | CL     |             |            | -         | BROOK-66N92W 5SWSW | RI          |

**General Comment:**

On 8/23/2024, Western Reclamation Work Lead Trujillo, and Reclamation Specialist Trujillo conducted a final reclamation inspection at SWN Production Company LLC's BROOK #14-5 location in Moffat County, Colorado.

This inspection is in response to Form 4 #403816943 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:

-Final Reclamation of the Location and Access road

-Weeds

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:   | 282912 | Type: | WELL     | API Number: | 081-07273 | Status: | PA | Insp. Status: | RI |
| The subreport 'InspWellFlowline' could not be found at the specified location \\10.14.12 |        |       |          |             |           |         |    |               |    |
| Facility ID:   | 311776 | 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 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: \_\_\_\_\_

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 \_\_\_\_\_ Locations, facilities, roads, recontoured **Fail**

Compaction alleviation \_\_\_\_\_ Dust and erosion control \_\_\_\_\_

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

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: [See "COGCC Comments"](#)

Corrective Action: [See "COGCC Comments"](#) Date **10/15/2024**

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

**ECMC Comments**

| Comment  | User       | Date       |
|--|------------|------------|
| <p><b>CORRECTIVE ACTIONS</b></p> <p>Conduct reclamation in accordance with 1004 rules at the Location/Road including, but not limited to removal of 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 (Road/noncropland). Determine the issues hindering crop production and collaborate with the surface owner to determine mitigating measures so reclamation work will be conducted in such a manner as to not interfere with Surface Owner's agricultural activities and crop production.</p> <p>Comply with Rule 1002.f and ensure erosion controls are implemented to stabilize the seeded soil.</p> <p>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.</p>  | trujilloam | 09/13/2024 |
| <p><b>RECLAMATION COMMENTS</b></p> <p>Pursuant to Rule 1004.a, 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 three (3) months on crop land and 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 Location has been reclaimed to cropland within the western half, and non-cropland within the eastern half.</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 of the Location have not achieved uniform vegetative establishment. Noxious weeds (Scotch thistle, Canada thistle, Common Mullein, Knapweed) observed throughout the Location. It is noted that species planted within the non-cropland areas do not reflect species within the adjacent undisturbed reference areas, or vegetation that existed pre-disturbance; records show surface owner approved of the mix.</p> <p>Most recent crop planting appears to be Safflower. Crop vegetative establishment on the well location/disturbance area is not reflective of the reference area; there are areas where issues appear to exist that are hindering crop establishment; crop establishment is thin, growth is stunted, and not reflective of the crop established within adjacent off-site areas; compaction, remediation, or other issues may still exist within these areas.</p> | trujilloam | 09/13/2024 |

**Attached Documents**

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

| Document Num | Description       | URL   |
|--------------|-------------------|---|
| 696206216    | Inspection Photos | <a href="https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706321">https://ecmc.state.co.us/weblink/DownloadDocumentPDF.aspx?DocumentId=6706321</a> |